

**A.2 Part A/  
Interim Status**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

APR 01 1992

REPLY TO THE ATTENTION OF:

ROGER BROS INC HOT DIP  
ATTN SCOTT PETERSON  
2007 KISHWA  
ROCKFORD IL 61104

RE: US EPA ID Number ILD 005 113 063

Location: 2007 KISHWA

ROCKFORD IL 61104

In response to your correspondence of MAR 02 1992, the following  
information has been updated:

Name of Installation to	ROGER BROS INC HOT DIP
Generator status to	LARGE QUANTITY
Addition of waste code	D006 D007
Deletion of waste code	F003 D005

If you have any questions, please call me at (312) 886-6173.

Sincerely,

A handwritten signature in cursive script, reading "Sharon Kiddon".

Sharon Kiddon  
RCRA Notifications Coordinator  
Waste Management Division

cc: State Agency  
File

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



# Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received  
(For Official Use Only)

MAR 02 1992

## I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒B. Subsequent Notification  
(complete item C)

C. Installation's EPA ID Number

1400051130630

## II. Name of Installation (Include company and specific site name)

C ROGER BROS INC HOT DIP

## III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

2007 KISHWA

Street (continued)

City or Town

ROCKFORD

State

ZIP Code

IL 61104-

County Code

County Name

WINNEBAGO

## IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

SAME

City or Town

State

ZIP Code

## V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

PETERSON

(first)

MR. SCOTT

Job Title

TECH DIRECTOR

Phone Number (area code and number)

815-965-5132

## VI. Installation Contact Address (See Instructions)

A. Contact Address  
Location Mailing☐☐

B. Street or P.O. Box

SAME

City or Town

State

ZIP Code

## VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

SAME

Street, P.O. Box, or Route Number

City or Town

State

ZIP Code

Phone Number (area code and number)

B. Land Type

C. Owner Type

D. Change of Owner  
Indicator

Yes

No

(Date Changed)  
Month Day Year

ROGER BROS INC

ID - For Official Use Only

## VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

## A. Hazardous Waste Activity

1. Generator (See instructions)
- ☒ a. Greater than 1000kg/mo (2,200 lbs.)
- ☐ b. 100 to 1000 kg/mo (220 - 2,200 lbs.)
- ☐ c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
- ☒ a. For own waste only
- ☐ b. For commercial purposes
- Mode of Transportation
- ☐ 1. Air
- ☐ 2. Rail
- ☒ 3. Highway
- ☐ 4. Water
- ☐ 5. Other - specify
3. Treater, Storer, Disposer (at installation)  
Note: A permit is required for this activity; see instructions.
4. Hazardous Waste Fuel
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketers
- ☐ c. Burner - indicate device(s) - Type of Combustion Device
- ☐ 1. Utility Boiler
- ☐ 2. Industrial Boiler
- ☐ 3. Industrial Furnace
- ☐ 5. Underground Injection Control

## B. Used Oil Fuel Activities

1. Off-Specification Used Oil Fuel
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketer
- ☐ c. Burner - indicate device(s) - Type of Combustion Device
- ☐ 1. Utility Boiler
- ☐ 2. Industrial Boiler
- ☐ 3. Industrial Furnace
2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification

## IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001) ☒
2. Corrosive (D002) ☒
3. Reactive (D003) ☐
4. EP Toxic (D000) ☐
- (List specific EPA hazardous waste number(s) for the EP Toxic contaminant(s))

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
D006	D007				
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring an I.D. number. See instructions.)

1	2	3	4	5	6

## X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature	Name and Official Title (type or print)	Date Signed
<i>[Signature]</i>	David F. Broussard - Production Manager	2/11/92

## XI. Comments

PLEASE DELETE ALL OTHER WASTE CODES FROM YOUR RECORDS, THIS IS THE ONLY TYPES OF WASTES ROGER BROS INC. GENERATES.





UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
RCRA ACTIVITIES  
P.O. BOX A3587  
CHICAGO, ILLINOIS 60690

JAN 13 1992

Roger Bros. Inc.  
Attn: Scott M. Peterson  
2007 Kishwaukee  
Rockford, IL 61104

RE: EPA ID #:     ILD 005 113 063    

In response to your request of     12-16-91     the following  
information has been updated:

Installation contact to  
Generator status to  
Addition of waste code

Scott Peterson  
small *-very*  
F003 F005

If you have any questions, please contact me at (312) 886-6173.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sharon Kiddon".

Sharon Kiddon  
RCRA Notifications Coordinator  
Waste Management Division

cc: State Agency  
File

COPY

Please refer to the instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3070 of the Resource Conservation and Recovery Act).



# Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received  
(For Official Use Only)

DEC 16 1991

## I. Installation's EPA ID Number (Mark 'X' in the appropriate box)



A. First Notification

B. Subsequent Notification  
(complete item G)

C. Installation's EPA ID Number

ILD 005113063

## II. Name of Installation (Include company and specific site name)

ROGER BROS INC

## III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

2007 KISHWAUKEE

Street (continued)

City or Town

ROCKFORD

State

ZIP Code

IL 61104-

County Code

County Name

WINNEBAGO

## IV. Installation Mailing Address (See instructions)

Street or P.O. Box

SAME

City or Town

State

ZIP Code

## V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

PETERSON

(first)

M SCOTT

Job Title

TECH DIRECTOR

Phone Number (area code and number)

815-965-5132

## VI. Installation Contact Address (See instructions)

A. Contact Address  
Location Mailing

B. Street or P.O. Box

SAME

City or Town

State

ZIP Code

## VII. Ownership (See instructions)

## A. Name of Installation's Legal Owner

SAME

Street, P.O. Box, or Route Number

City or Town

State

ZIP Code

Phone Number (area code and number)

B. Land Type

C. Owner Type

D. Change of Owner  
Indicator(Date Changed)  
Month Day Year

Yes

No



ID - For Official Use Only

## VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

## A. Hazardous Waste Activity

## 1. Generator (See Instructions)

- ☐ a. Greater than 1000 kg/mo (2,200 lbs.)  
☐ b. 100 to 1000 kg/mo (220 - 2,200 lbs.)  
☒ c. Less than 100 kg/mo (220 lbs.)

## 2. Transporter (Indicate Mode in boxes 1-5 below)

- ☐ a. For own waste only  
☐ b. For commercial purposes

## Mode of Transportation

- ☐ 1. Air  
☐ 2. Rail  
☒ 3. Highway  
☐ 4. Water  
☐ 5. Other - specify: \_\_\_\_\_

## 3. Treater, Storer, Disposer (all installation)

Note: A permit is required for this activity; see instructions.

## Hazardous Waste Fuel

- ☐ a. Generator Marketing to Burner  
☐ b. Other Marketers

## c. Burner - Indicate device(s) - Type of Combustion Device

- ☐ 1. Utility Boiler  
☐ 2. Industrial Boiler  
☐ 3. Industrial Furnace

- ☐ 4. Underground Injection Control

## B. Used Oil Fuel Activities

## 1. Off-Specification Used Oil Fuel

- ☐ a. Generator Marketing to Burner  
☐ b. Other Marketers

## c. Burner - Indicate device(s) - Type of Combustion Device

- ☐ 1. Utility Boiler  
☐ 2. Industrial Boiler  
☐ 3. Industrial Furnace

- ☐ 2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification

## IX. Description of Regulated Wastes (Use additional sheets if necessary)

## A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001) ☒ 2. Corrosive (D002) ☐ 3. Reactive (D003) ☐ 4. EP-Toxic (D006) ☐ (Use specific EPA hazardous waste number(s) for the EP Toxic contaminant(s))

## B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1 F003	2 F005	3	4	5	6
7	8	9	10	11	12

## C. Other Wastes. (State or other wastes requiring an I.D. number. See instructions.)

1	2	3	4	5	6
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## X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature

Name and Official Title (type or print)

M. SCOTT PETERSON TECHNICAL DIR

Date Signed

11-26-91

## XI. Comments

RECEIVED

DEC 08 1991

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)



ACKNOWLEDGEMENT OF NOTIFICATION  
OF HAZARDOUS WASTE ACTIVITY  
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

ILD005113063

REACKNOWLEDGEMENT

INSTALLATION ADDRESS

ROGERS BROTHERS INC  
2007 KISHWAUKEE STREET  
ROCKFORD

IL 61108

2007 KISHWAUKEE STREET  
ROCKFORD

IL 61108



A



**ACKNOWLEDGEMENT OF NOTIFICATION  
OF HAZARDOUS WASTE ACTIVITY  
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

ILD0005113063

REACKNOWLEDGEMENT

ROGERS BROTHERS CO INC  
2007 KISHNAUKEE  
ROCKFORD

IL 61108

INSTALLATION ADDRESS

2007 KISHNAUKEE  
ROCKFORD

IL 61108

08/14/81

U.S. ENVIRONMENTAL PROTECTION AGENCY  
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

ILD005113063

NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

ROGERS BROTHERS CO INC  
2007 KISHWAUKEE  
ROCKFORD, IL 61108

III. LOCATION OF INSTALLATION

2007 KISHWAUKEE  
ROCKFORD, IL 61108

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

000034 AUG 20 1980

## FOR OFFICIAL USE ONLY

## COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED (yr., mo., &amp; day)

F I L D 0 0 5 1 1 3 0 6 3 2 1 A 8 0 0 8 1 8

## I. NAME OF INSTALLATION

R O G E R S B R O T H E R S C O I N C

## II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3 2 0 0 7 K I S H W A U K E E

CITY OR TOWN

ST.

ZIP CODE

R O C K F O R D

I L 6 1 1 0 8

## III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5 2 0 0 7 K I S H W A U K E E

CITY OR TOWN

ST.

ZIP CODE

6 R O C K F O R D

I L 6 1 1 0 8

## IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, &amp; job title)

PHONE NO. (area code &amp; no.)

2 R A Y M O N D V M C K I N N O N V I C E - P R E S

8 1 5 - 9 6 5 - 5 1 3 2

## V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 R O G E R S B R O T H E R S C O I N C

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

F = FEDERAL  
M = NON-FEDERAL

M

☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

## VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

NOT APPLICABLE

## VIII. FIRST OR SUBSEQUENT NOTIFICATION

"X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

I L D 0 0 5 1 1 3 0 6 3

## IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

AUG 18 1980



5	W	L	D	0	0	8	1	1	3	0	6	3	2	1
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

## IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

NOT APPLICABLE

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
K 0 6 3	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

NOT APPLICABLE

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

NOT APPLICABLE

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

NOT APPLICABLE

☐ 1. IGNITABLE  
(D001)

☐ 2. CORROSIVE  
(D002)

☐ 3. REACTIVE  
(D003)

☐ 4. TOXIC  
(D000)

## X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE



NAME &amp; OFFICIAL TITLE (type or print)

 RAYMOND V. MCKINNON  
VICE-PRESIDENT

DATE SIGNED

8-15-80

**C.2 Compliance/  
Enforcement**



April 9, 2014

**FEDERAL EXPRESS**

Tracking # 8668 5033 6825

Mr. Todd Brown  
U.S. Environmental Protection Agency  
77 West Jackson Boulevard, LR-8J  
Chicago, Illinois 60604

Re: Rogers Brothers Galvanizing, Inc.  
1925 Kishwaukee Street  
Rockford, Illinois 61104  
EPA ID No.: ILD005113063  
*Response to Notice of Violation Dated 3/05/2014*

Dear Mr. Brown:

This letter serves as a formal written response to the Notice of Violation ("NOV") dated March 5, 2014 sent to Rogers Brothers Galvanizing ("Roger's") for its facility located at 1925 Kishwaukee Street in Rockford, Illinois. The NOV is based upon the U.S. Environmental Protection Agency's ("Agency" or "EPA") review of available information and an EPA inspection conducted on May 29, 2013. Rogers received the NOV on March 7, 2014 and a response was due into the Agency on or before April 5, 2014; however, you had granted an extension to the reply due date. The new revised due date is April 11, 2014. We are timely submitting this written response to the alleged violations.

**PLANT RESPONSES TO ALLEGED VIOLATIONS**

This reply, in part, provides an answer to the alleged violations but also documents the actions which have been taken in response to the NOV. Below, a description of the alleged violations have been copied from the Agency's NOV and appear in *italicizes*. The responses appear beneath each alleged violation.

**1) Alleged Violation #1**

*A generator must determine whether a waste it generates is a hazardous waste. See, 35 IAC § 722.111 [40 C.F.R. § 262.11]. At the time of the inspection, RBG had not made a hazardous waste determination on unknown solid material inside of a rusty, dented and open-container, which was located in the building with an address of 1925 Kishwaukee Street (1925 Building) (see photographs 3 and 4 of the attached inspection report). RBG therefore violated the above-referenced generator requirement.*

**Response to Alleged Violation #1**

The referenced product was a broken bag of hydrated lime that was being contained for use inside a metal 55-gallon drum. The hydrated lime is not a waste but a product, which is currently in-use and therefore, is not regulated by RCRA and is not subject to 35 IAC § 722.111 [40 C.F.R. § 262.11]. The material and drum in question is located in the section of the plant reserved only for raw product material storage. Rogers has a second area, quite a distance away from their product storage, which is solely designated for the accumulation of hazardous waste. Roger's actions of clearly and consistently separating its accumulation area for hazardous waste from raw material storage is an organizational system used to further keep track of its waste management practices. Making a hazardous waste determination on a chemical product is not applicable to this situation. In light of the above, it appears that this violation has been cited in error.

2) **Alleged Violation #2**

*Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil." See, 35 IAC § 739.122(c)(1) [40 C.F.R. § 279.22(c)(1)]. At the time of the inspection, a container for collection of used oil located in the 1925 Building was not labeled with the words "Used Oil" (see photograph 5 of the attached inspection report). RBG therefore violated the above-referenced used oil generator requirement.*

**Response to Alleged Violation #2**

Notwithstanding the exemption contained in 40 C.F.R. § 279.11 regarding used oil burned for energy recovery, which could potentially render this alleged violation moot, the referenced container holding used oil from fork trucks has been labeled. A copy of a photograph showing the labeled tank can be found in Attachment 1. This alleged violation is not subject to RCRA storage exemption requirements.

3) **Alleged Violation #3**

*In order to avoid the need for a hazardous waste storage permit, a large quantity generator using satellite accumulation containers to store hazardous waste must mark the containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers. See, 35 IAC § 722.134(c)(1)(B) [40 CFR § 262.34(c)(1)(ii)]. At the time of the inspection, two 55-gallon containers for the accumulation of hazardous waste oily skimmings located adjacent to two sulfuric acid process tanks were not labeled with the words, "Hazardous Waste" or other words to describe their contents. These containers were located in the building addressed 2007 Kishwaukee Street (2007 Building). Therefore, RBG failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption.*

**Response to Alleged Violation #3**

The waste profile conducted by Safety Kleen for the oil skimmings (acid bath residue) found in Attachment 2 indicates that the material has a pH of 2.4, which would render the waste non-hazardous. Therefore, 35 IAC § 722.134(c)(1)(B) [40 CFR § 262.34(c)(1)(ii)] does not apply to this apparent discrepancy. This alleged violation has been cited in error.

**4) Alleged Violation #4**

*In order to avoid the need for a hazardous waste storage permit, a large quantity generator using satellite accumulation containers to store hazardous waste must always keep the containers closed except when it is necessary to add or remove waste. See, 35 IAC §§ 722.134(c)(1)(A) and 725.273(a) [40 CFR §§ 262.34(c)(1)(i) and 265.173(a)]. This is also a requirement of owners and operators of hazardous waste storage facilities that use containers to store hazardous waste under 35 IAC § 724.273(a) [40 C.F.R. § 264.173(a)]. At the time of the inspection, two 55-gallon containers for the accumulation of hazardous waste oily skimmings located adjacent to two sulfuric acid process tanks in the 2007 Building were open at a time when waste was not being added to nor removed from the containers. RBG therefore failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption, and violated the storage facility container requirement.*

**Response to Alleged Violation #4**

The oil skimming waste profile (acid bath residue) found in Attachment 2 indicates that the material has a pH greater than 2.0, which would render the material a non-hazardous waste. Therefore, 35 IAC §§ 722.134(c)(1)(A) and 725.273(a) [40 CFR §§ 262.34(c)(1)(i) and 265.173(a)] does not apply to this situation. This alleged violation has been cited in error.

**5) Alleged Violation #5**

*In order to avoid the need for a hazardous waste storage permit, a large quantity generator must have a contingency plan for the facility that includes, among other items, the names, addresses, and phone numbers (office and home) of all person qualified to act as emergency coordinator. See, 35 IAC §§ 722.134(a)(4) and 725.152(d) [40 C.F.R. §§ 262.34(a)(4) and 265.52(d)]. This is also a requirement of owners and operators of hazardous waste storage facilities under 35 IAC 724.152(d) [40 C.F.R. 264.52(d)]. At the time of the inspection, the home address of Mr. Agapito Chavez was not included in RBG's hazardous waste contingency plan, despite Mr. Agapito being listed as an emergency coordinator. RBG therefore failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption, and violated the hazardous waste storage facility contingency planning requirement.*

**Response to Alleged Violation #5**

The home address of Mr. Agapito is now listed in Roger's *Emergency Contingency and Spill Control Plan*. On April 9, 2014 the updated contingency plan was submitted to the local police departments, fire departments, hospitals, and State and local emergency response teams. A copy of the revised page along with copies of the cover letters sent to the emergency authorities can be found in Attachments 3 and 5, respectively.

6) **Alleged Violation #6**

*In order to avoid the need for a hazardous waste storage permit, a large quantity generator must have a contingency plan for the facility that includes, among other items, a description of the arrangements agreed to by local police department, fire department, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to 35 IAC § 725.137 [40 C.F.R. § 265.37]. See, 35 IAC §§ 722.134(a)(4) and 725.152(c) [40 C.F.R. §§ 262.34(a)(4) and 265.52(c)]. This is also a requirement of owners and operators of hazardous waste storage facilities under 35 IAC § 724.152(c) [40 C.F.R. §§ 264.52(c)]. At the time of the inspection, RBG's contingency plan did not describe the above-mentioned arrangements. RBG therefore failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption, and violated the hazardous waste storage facility contingency planning requirement.*

**Response to Alleged Violation #6**

The contingency plan has been updated and a description of the arrangements agreed to by emergency personnel to coordinate services has been provided. The description is general in nature and a copy of the revised plan has been sent to the applicable emergency authorities. Copies of the revised pages along with the cover letters sent can be found in Attachments 4 and 5, respectively.

7) **Alleged Violation #7**

*A large quantity generator who accumulates hazardous waste on-site and who does not meet the conditions for a hazardous waste storage permit exemption of 35 IAC §§ 722.134(a) and (c) is an operator of a hazardous waste storage facility, and is required to obtain an Illinois hazardous waste storage permit. See, 35 IAC § 703.121(a) [40 C.F.R. § 270.1(c)]. Upon failing to comply with the permit exemption conditions identified in items 3-6, above, RBG's failure to apply for and obtain a hazardous waste storage permit violated the permitting requirements of 35 IAC § 703.121(a) [40 CFR § 270.1(c)].*



Mr. Todd Brown  
April 9, 2014  
Page 5

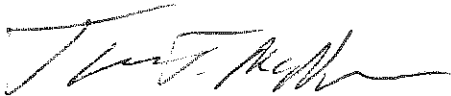
**Response to Alleged Violation #7**

Rogers has corrected the alleged paperwork infractions identified in Items 5 and 6 above. Items 3 and 4 identified above are not applicable to Alleged Violation #7 because of their non-RCRA nature.

We trust the above response resolves the discrepancies communicated in the Notice of Violation. Rogers Brothers remains committed to complying with all aspects of the Resource Conservation and Recovery Act and are appreciative of the fact that the inadvertent oversight of the minor paperwork indiscretions identified above has not resulted in any harm to human health or the environment. If you have any questions concerning this reply or need any additional information to explain the actions taken in response to these issues, please do not hesitate to contact me. I can be reached at (815) 877-7530.

Sincerely,

ENVIRONMENTAL COMPLIANCE CONSULTING, LTD.



Thomas J. McNamee  
President

TJM/mlf  
Attachments (5)

cc: Mr. Michael McKinnon/Rogers Brothers Galvanizing (via U.S. First Class Mail)  
File: EPA Response 0409 2014

## **Attachment 1**

### **Photograph of Labeled Used Oil Container**

USED  
ENGINE  
OIL

## **Attachment 2**

### **Waste Profile for Oil Skimmings (Acid Bath Residue)**



## PREGUALIFICATION EVALUATION

PAGE 1 OF 5  
COMPLETED: 10/02/02  
REVISED: 10/17/02  
RUN: 12/14/04

BRANCH/SUBMITTER: 503401  
ELGIN 01

CONTROL #: 2159333-3  
LAB #: 2159333-3  
PROFILE REF #: 2444650

ROGERS BROTHERS INC  
1925 KISHWAUKEE STREET  
ROCKFORD IL 61104

BRANCH: 503401 - ELGIN 01

[illegible]

\*\*\*\*\* MATERIAL IS APPROVED AS PASS THROUGH ONLY. DO NOT PROCESS AT RC \*\*\*\*\*

#### 4. GENERATOR INFORMATION:

GENERATOR NAME & FACILITY ADDRESS:

BILLING COMPANY &amp; ADDRESS:

ROGERS BROTHERS INC  
1925 KISHWAUKEE STREET  
ROCKFORD IL 61104

CONTACT: EARNLEY GHELBURNE

08-1965-5162

FOX: 813-965-3765

U. I. G. 3479

STATUS: CESQG US EPA ID: ILD005113063

STATE ID: IL 2010300030

B. SHIPPING INFORMATION: DOT ASSISTANCE REQUESTED

HAZ CLASS/DIVISION: 8.0 ID# (UN/NA): UN3244

PACK GRP: II

NON-BULK SHIPPING CONTAINERS

# STEELE

QTY: 6 FREQ: 52 WEEKS

DATE OF LAST WASTE SHIPMENT: 10/29/2004

\*\*\* PASS THROUGH APPROVED

CONTINUED ON NEXT PAGE

PASS THROUGH APPROVED

BRANCH/SUBMITTER: 503401  
ELOIN 01

CONTROL #: 2159333-3  
LAB #: 2159333-3  
PROFILE REF #: 2444850

C. GENERAL MATERIAL & REGULATORY INFORMATION:

NAME OF MATERIAL: ACID BATH RESIDUE

PROCESS DESCRIPTION: FROM CLEAN-OUT

ODOR: NONE

YES NO

- X REGULATED OR LICENSED RADIOACTIVE WASTE
- X REGULATED MEDICAL / INFECTIOUS WASTE
- X WASTE SUBJECT TO BENZENE NESHAP REGULATIONS
- X TSCA REGULATED PCB WASTE
- X REGULATED SUBPART CC WASTE (VOC'S >= 500 PPM)
- X REGULATED OZONE DEPLETING SUBSTANCE
- X CERCLA REGULATED (SUPERFUND) WASTE
- X HAZARDOUS DEBRIS
- X WASTE CONTAINS UHC'S/CONSTITUENTS OF CONCERN (NON-HAZ)
- X UHC IN SECTION D
- X UHC IN ADDENDUM
- X MEETS LDR STANDARDS
- X PARTIALLY MEETS (FOR LANDFILL ONLY)
- X COMMINGLED WASTE
- X SORBENT ADDED
- X BIODEGRADABLE?
- X EXEMPT WASTE; IF YES, LIST REFERENCE 40 CFR
- X STATE HAZARDOUS WASTE
- X EPA HAZARDOUS WASTE

STATE WASTE CODES: TX OUTS3191  
EPA WASTE CODES: NONE

CTRY: USA

D. MATERIAL COMPOSITION: ANALYTICAL

RMP COMPOUND DENOTED WITH #

1. CHEMICAL/PHYSICAL CONSTITUENTS:  
TRACES OF VOLATILE ORGANICS DETECTED

.77 WT%

RESIDUE DESCRIPTION: ACID BATH RESIDUE

2. ELEMENTAL CONSTITUENTS:

THE FOLLOWING VALUES ASSOCIATED WITH THE "<" ARE NON-DETECTED. THE VALUE LISTED IS THE REPORTING LIMIT.

E. REACTIVE CHARACTERISTICS: WASTE EXHIBITS NO REACTIVE CHARACTERISTICS

YES NO

- X EXPLOSIVE
- X SHOCK SENSITIVE
- X PYROPHORIC
- X OXIDIZER
- X WATER REACTIVE
- X AIR REACTIVE
- X REACTIVE CYANIDE .00
- X REACTIVE SULFIDE .00
- X POLYMERIZABLE

\*\*\* PASS THROUGH APPROVED

CONTINUED ON NEXT PAGE

81363-R4505 (REPRINT)      PREQUALIFICATION EVALUATION  
PARTS WASHER SERVICE  
FLUID RECOVERY SERVICES

PAGE 3 OF 5  
COMPLETED: 10/02/02  
REVISED: 10/17/02  
RUN: 12/14/04

PASS THROUGH APPROVED

BRANCH/SUBMITTER: 503401  
ELGIN 01

CONTROL #: 2159333-3  
LAB #: 2159333-3  
PROFILE REF #: 2444850

---

F. MATERIAL PHYSICAL CHARACTERISTICS @ 70F:

# OF PHASES	1.0	
SOLID %	100.0	
VISCOSITY	>50000	
NO FLASH AT	140.0	F
ASH %	35.0	WT%
PH NON-AQUEOUS		
PH	2.4	
BTU'S / LB. OR RANGE	< 500.0	BTU/LB

---

SK SALES REP NAME: KELLY COOKE

---

\*\*\* PASS THROUGH APPROVED

CONTINUED ON NEXT PAGE

81363-R4505 (REPRINT)      PREQUALIFICATION EVALUATION  
PARTS WASHER SERVICE  
FLUID RECOVERY SERVICES

PAGE 4 OF 5  
COMPLETED: 10/02/02  
REVISED: 10/17/02  
RUN: 12/14/04

PASS THROUGH APPROVED

BRANCH/SUBMITTER: 503401  
ELGIN 01

CONTROL #: 2159333-3  
LAB #: 2159333-3  
PROFILE REF #: 2444850

CORPORATE REVIEW:

DISPOSITION: PASS THROUGH AP      SALES PART: 0892225      CORROSIVE SOLID 55G  
TECHNOLOGY DISPOSITION CODE: IRSD INCIN RCRA SOLIDS  
REVIEW DATE: 10/02/2002      REVIEWERS: AW

APPROVED FACILITIES:

SAFETY-KLEEN SYSTEMS, INC.  
633 E 138TH ST  
DOLTON, IL 60419  
FED EPA#: ILD980613913  
STATE EPA#: 0310690006  
TELEPHONE: 7082258100  
STATE AUTH:

APPROVED DOT - SHIPPING DESCRIPTION

0048713      DRUM OR BULK      SOLIDS CONTAINING CORROSIVE LIQUID,  
N.O.S. (CONTAINS SULFURIC ACID) B UN3244  
PG II (ERG#154)

STATE/PROV. CODES: TX DUTS3191  
US EPA WASTE CODES: NONE  
USA

REVIEW COMMENTS:

\*\*\*\*\*  
\*  
\* OK FOR LANDFILL. SLUDGES AND LIQUIDS NEED TO BE SOLIDIFIED PRIOR TO  
\* LANDFILLING.  
\*  
\* APPROVAL FOR INCINERATION OF SOLIDS.  
\*  
\* RECEIVED ADDENDUM LISTING CONSTITUENTS IN THE WASTE. CONTAIN SULFURIC ACID  
\* RESIDUE ABOVE PROCESSING LIMITS AT THE RECYCLE CENTERS. 10/17/02 MS  
\*\*\*\*\*

THIS SERVES AS NOTICE PER FEDERAL AND STATE REGULATIONS THAT EACH FACILITY  
NOTED ABOVE HAS THE APPROPRIATE PERMITS, CAPABILITIES, CAPACITY, AND IS  
WILLING TO ACCEPT THE MATERIAL AS DESCRIBED IN THE APPROVAL SECTION.  
IT IS THE RESPONSIBILITY OF THE GENERATOR TO NOTIFY SAFETY-KLEEN CORP. OF  
ANY CHANGES IN THE PROCESS GENERATING THIS WASTE STREAM.

\*\*\* PASS THROUGH APPROVED

CONTINUED ON NEXT PAGE



81363-R4505 (REPRINT)      PREQUALIFICATION EVALUATION  
PARTS WASHER SERVICE  
FLUID RECOVERY SERVICES

PAGE 5 OF 5  
COMPLETED: 10/02/02  
REVISED: 10/17/02  
RUN: 12/14/04

PASS THROUGH APPROVED

BRANCH/SUBMITTER: 503401  
ELGIN 01

CONTROL #: 2159333-3  
LAB #: 2159333-3  
PROFILE REF #: 2444850

-----  
ADDITIONAL ANALYTICAL

RESULT DESCRIPTION/ELEMENT

RESULT

PCB

NONE

PCB AMOUNT

OTHER

< 1.0 MG/KG

THE ANALYSIS CONTAINED HEREIN ARE PERFORMED SOLELY FOR THE PURPOSE OF  
QUALIFYING THE ANALYZED MATERIALS FOR ACCEPTANCE BY SAFETY-KLEEN CORP. IN  
ACCORDANCE WITH ITS PERMITS AND PROCESSING CAPABILITIES.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE IS NOT REQUIRED.

\*\*\* PASS THROUGH APPROVED

END OF DOCUMENT

## **Attachment 3**

### **Revised Contingency Plan (Emergency Coordinator Address)**

# EMERGENCY CONTINGENCY And SPILL CONTROL PLAN

## *Emergency Telephone Numbers:*

Rockford **FIRE** Department.....911  
Rockford **POLICE** Department.....911  
Rescue Squad – **PARAMEDICS**.....911

### **Swedish American Hospital**

1400 Charles St.  
Rockford, IL 61104.....(815) 961-2430

### **St. Anthony Hospital**

5666 East State Street  
Rockford, Illinois 61108.....(815) 226-2000

### **Rockford Memorial Hospital**

2400 North Rockton Avenue  
Rockford, Illinois 61103.....(815) 968-6861

Illinois Poison Center (Chicago).....(800) 222-1222  
Illinois EPA Emergency Contact.....(217) 782-3637  
Illinois Emergency Management Agency.....(800) 782-7860  
Rock River Water Reclamation District.....(815) 387-7455

## *Off Hours Emergency Contacts:*

### **Plant Emergency Coordinator**

Non responsive



### **Alternate Emergency Coordinator**

Non responsive





## **Attachment 4**

### **Revised Contingency Plan (Emergency Authority Arrangements)**

## **EMERGENCY CONTINGENCY And SPILL CONTROL PLAN**

### ***Emergency Authorities:***

The following list identifies the emergency authorities Rogers Brothers, Inc. will use in the event of an emergency. All those on the list have been sent a copy of this plan via certified mail (return receipt) and all have agreed to provide emergency assistance in their specific specialty (fire suppression, traffic control, spill response coordination, public evacuation, first aid, paramedic services, treatment of trauma and other injuries, etc.) in the event of a fire, explosion, sudden or nonsudden release of hazardous waste, or injuries to employees:

### **Primary Emergency Authority**

Division Chief Joe Corl  
Rockford Fire Department  
204 South First Street  
Rockford, Illinois 61104  
(815) 987-5645

### **Secondary Authorities**

Deputy Chief Don Gasparini, Jr.  
Winnebago County Sheriff's Department  
650 West State Street  
Rockford, Illinois 61102  
(815) 319-6184

Master Sergeant Hientz  
Illinois State Police District 16  
16250 West State Road  
Pecatonica, Illinois 61063  
(815) 239-1152

Mr. Brian Brackemyer  
Illinois EMA  
1325 North Galena Avenue  
Dixon, Illinois 61021  
(815) 288-1455

Deputy Chief Lori Sweeney  
Rockford Police Department  
420 West State Street  
Rockford, Illinois 61101  
(815) 987-5031

Mr. Dennis Lolli  
Winnebago County ESDA  
650 West State Street  
Rockford, Illinois 61102  
(815) 319-6218

## **EMERGENCY CONTIGENCY and SPILL CONTROL PLAN**

### ***Hospitals:***

Mr. John Acardo  
c/o Engineering Department  
Rockford Memorial Hospital  
2400 North Rockton Avenue  
Rockford, Illinois 61103  
(815) 968-6861

Mr. Shawn Shahgheibi  
Director of Plant Operations  
St. Anthony Hospital  
5666 East State Street  
Rockford, Illinois 61108  
(815) 226-2000

Mr. Denny Eccles  
c/o Safety Department  
Swedish American Hospital  
1401 East State Street  
Rockford, Illinois 61104  
(815) 968-4400



## **Attachment 5**

### **Cover Letter to Emergency Authorities**

334 East Riverside Blvd • Loves Park, Illinois 61111  
Telephone: 815.877.7530 • Facsimile: 815.877.5630  
E-mail: ecoltd@comcast.net

April 9, 2014

**CERTIFIED MAIL**

Return Receipt

7011 3500 0001 8900 6443

Division Chief Joe Corl  
Rockford Fire Department  
204 South First Street  
Rockford, Illinois 61104

Re: Rogers Brothers, Inc.  
1925 Kishwaukee Street  
Rockford, Illinois 61104  
*Submittal of Revised Emergency  
Contingency and Spill Control Plan*

Dear Chief Corl:

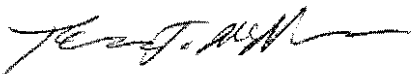
Please find enclosed, an updated revised report entitled "Emergency Contingency and Spill Control Plan" for the above-referenced company ("Rogers Brothers"). This report amends the home address of one of the facility emergency coordinators and describes in a general way, the emergency arrangements agreed to by the emergency authorities.

This revised document is being submitted to you pursuant to 35 Ill. Adm. Code § 725.153(b) and 40 CFR § 265.53(b), as required by the Illinois and U.S. EPA's. It is our understanding that in the event of an emergency, your agency will provide the necessary emergency services and/or provide emergency health care to Rogers Brothers and their employees to reduce the danger to human health and the environment, where applicable.

A distribution list has been attached to this letter, which shows all the emergency service providers receiving copies of the revised report. If you cannot agree to perform the aforementioned services, please respond in writing via certified mail (return receipt) by May 1, 2014 to my attention at the address noted on this letterhead. Please call me if you have any questions regarding this information. I can be reached at (815) 877-7530. Thank you for your assistance.

Sincerely,

ENVIRONMENTAL COMPLIANCE CONSULTING, LTD

  
Thomas J. McNamee  
President

TJM/mlf  
Enclosure (1)  
Attachment (1)

cc: Mr. Mike McKinnon/Rogers Brothers, Inc. (via U.S. First Class Mail)  
File: HazWasteContPlan.0414UpdateCvrLtr.doc.

## Distribution List

Division Chief Joe Corl  
Rockford Fire Department  
204 South First Street  
Rockford, Illinois 61104

Deputy Chief Don Gasparini, Jr.  
Winnebago County Sheriff's Dept.  
650 West State Street  
Rockford, Illinois 61102

Master Sergeant Hientz  
Illinois State Police District 16  
16250 West State Road  
Pecatonica, Illinois 61063

Mr. Brian Brackemyer  
Illinois EMA  
1325 Galena Avenue  
Dixon, Illinois 61021

Deputy Chief Lori Sweeney  
Rockford Police Department  
420 West State Street  
Rockford, Illinois 61101

Mr. Dennis Lolli  
Winnebago County ESDA  
650 West State Street  
Rockford, Illinois 61102

Mr. John Acardo  
c/o Engineering Department  
Rockford Memorial Hospital  
2400 North Rockton Avenue  
Rockford, Illinois 61103

Mr. Shawn Shahgheibi  
Director of Plant Operations  
St. Anthony Hospital  
5666 East State Street  
Rockford, Illinois 61108

Mr. Denny Eccles  
c/o Safety Department  
Swedish American Hospital  
1401 East State Street  
Rockford, Illinois 61104



February 18, 2014

**FEDERAL EXPRESS**

Tracking # 8668 5033 6788

Mr. Todd Brown  
U.S. Environmental Protection Agency  
77 West Jackson Boulevard, LR-8J  
Chicago, Illinois 60604

Re: Rogers Brothers Galvanizing, Inc.  
1925 Kishwaukee Street  
Rockford, Illinois 61104  
EPA ID No.: ILD005113063  
*Response to 12/17/2013 Request for Information*

Dear Mr. Brown:

On behalf of Rogers Brothers Galvanizing, Inc. ("Rogers" or "Rogers Brothers") this correspondence serves to formally respond to the U.S. EPA's December 17, 2013 *Request for Information* under Section 3007 of the Resource Conservation and Recover Act ("RCRA"). Specifically, this response conveys information related to the management of zinc bearing materials at the facility of Rogers Brothers located at 1925 Kishwaukee Street in Rockford, Illinois. The 12/17/2013 letter had asked for the information within thirty (30) calendar days of receiving the request, which would be due on January 17, 2014. However, in our telephone conversation on January 17, 2014 you had granted an additional extension to the time frame. The new date for submittal is February 18, 2014.

The response below repeats in italics, the questions and/or requests found in the Attachment to Mr. Cunningham's 12/17/2013 letter. Roger's responses appear beneath each question. Mr. Michael McKinnon, President of Rogers Brothers, has signed a certification attesting that the information gathered is true and complete to the best of the signatory's knowledge and belief. The certification can be found in Attachment 1. If we find that any portion of the submitted information is incomplete, we will notify the EPA.

**REQUEST FOR INFORMATION**

*During an EPA inspection at Rogers Brothers Galvanizing (RBG) on May 29, 2013, it was found that RBG generates several zinc-bearing secondary materials from its galvanizing processes, including: bottom dross (from molten zinc tanks), zinc skimmings (from molten zinc tanks), solids removed from a quench water tank, and spent flux (or "black sal"). According to RBG, the above-mentioned secondary materials are sent off-site for recycling, including for use in the manufacture of fertilizer. With respect to these materials, please provide the following information.*

1. *Identify all person consulted in preparing the answers to this Request for Information. Provide the full name and title for each person identified.*

Mr. Michael McKinnon, President of Rogers Brothers, Inc.  
Mr. Tom Ferolie, Rogers Brothers, Inc.  
Mr. Tom McNamee, President of Environmental Compliance Consulting, Ltd.  
Mr. Jeff Palmer, Richker Metals  
Mr. Shreepal Nanavati, U.S. Zink  
Mr. John Malmgreen, Plant Manager of Eastern Alloy Raw Materials  
Mr. Bill Jeke, Trading Unit Manager of Ritchey Metals Company  
Mr. Sanjiv Sood, SB Enterprises  
Mr. John Malmgreen, Plant Manager of Eastern Alloys  
Mr. Todd Brown, U.S. EPA

2. *Provide the name and address of the facilities to which RBG has sent each of the above-mentioned secondary materials for recycling, during the three year period immediately preceding your receipt of this Request for Information. In your answer, be specific to which facility receives which material.*

The following brokers and recycling facilities were utilized:

- 1) Eastern Alloy Raw Materials (Bottom Dross, Skimmings)  
11 Henry Hennings Drive  
Maybrook, New York 12543
- 2) Richker Metals (Bottom Dross, Skimmings, Quench Water Solids, Flux)  
2230 Indianapolis Drive  
Whiting, Indiana 46394
- 3) Ritchey Metals Company (Bottom Dross, Skimmings, Quench Water Solids, Flux)  
30 Georgetown Road  
Canonsburg, Pennsylvania 15317
- 4) SB Enterprises (Bottom Dross, Skimmings, Flux)  
#5 Endicott Road  
Anover, Massachusetts 01810
- 5) U.S. Zinc (Bottom Dross, Skimmings)  
6020 Navigation Boulevard  
Houston, Texas 77001

3. *For each of the materials, describe how they are recycled by the off-site receiving facility. In your answer, describe the actual products (or intermediates) that are produced from the recycled materials, and the actual recycling process.*

**A. Molten Zinc Bottom Dross**

- Eastern Alloys – This broker repackages the material and sends it overseas for recycling.
- Richker Metals – Richker Metals is a broker and exports the dross for the manufacturing of zinc oxide or zinc dust.
- Ritchey Metals Company – The dross is exported to Southeast Asia for making zinc oxide and zinc dust.
- SB Enterprises – The bottom dross from this broker is shipped to India and Taiwan to make zinc oxide.
- U.S. Zinc – The bottom dross received by U.S. Zinc is melted, cleaned, skimmed, and completely converted to other products. The melted dross is placed into a crucible, is heated, and then the vapor is distilled and cooled in an airless environment to form zinc dust used as an ingredient in powder coatings. The byproducts of the process include crude zinc and oxides. Any impurities found are either processed in-house or are sold as byproducts to other industries.

**B. Zinc Skimmings**

- Eastern Alloys – The material is repackaged and sent overseas for recycling.
- Richker Metals – This broker sends the skimmings for the manufacturing of zinc products including zinc oxide for use in the agricultural field.
- Ritchey Metals Company – The skimmings are sent overseas to make zinc materials such as zinc chlorides, zinc sulfides, and zinc oxides.
- SB Enterprise – The skimmings are sent to Europe and India where the metals are separated and agricultural fertilizers are produced.
- U.S. Zinc – The zinc skimmings contain zinc in the metal form and the oxide form. The metal is retrieved from the skimmings by milling and separating from the oxidic. The metals are then placed into a furnace, melted and sold to Galvanizers. The oxidic portion of the skimmings (called zinc fines) is sold to the micronutrient agricultural sector to make zinc sulfate, which is placed as a micronutrient in the soil to assist in the growth of crops.

**C. Quench Water Tank Solids**

- Richker Metals – The quench tank solids are used to make zinc oxides and zinc sulfates used in both the galvanizing and agricultural fields.

- Ritchie Metals – The solids are sent overseas for reprocessing into zinc-related products such as zinc oxides, zinc sulfates, and zinc chlorides.

**D. Spent Flux (Black Sal)**

- Richker Metals – The flux is exported by Richker to Southeast Asia and used to make zinc sulfate.
- Ritchey Metals – The flux is sent overseas for reprocessing into zinc-related materials.
- SB Enterprises – The material is sent to Taiwan where it is converted to zinc oxide.

4. *For each of the above-mentioned secondary materials, state whether RBG is claiming the exclusion from identification as a solid waste (and therefore hazardous waste), at 35 IAC § 721.104(a)(20) [40 C.F.R. § 261.4(a)(20)], for hazardous secondary materials used to make zinc fertilizers (herein referred to as the “zinc fertilizer exclusion”). In your answer, be specific as to for which materials RBG is claiming the exemption.*

Rogers Brothers has been operating on the assumption that if disposed, its materials identified in this request would be nonhazardous waste, based on generator knowledge of the industrial processes. To eliminate any doubt regarding this assumption, on February 14 and 16, 2014, a waste analysis per Methods 6010C (TCLP Metals); 9045C (pH); and D92 (Flashpoint) was performed by Test America on each of the materials identified. The results show that all four (4) materials (two samples from the Quench Tank Solids were collected – one moist and one dry) would indeed, not be classified as hazardous wastes if they were to be discarded. A copy of the laboratory analysis can be found in Attachment 2. Each item below has been addressed separately.

- Bottom Dross – Since the material would not be classified as a hazardous waste if it were to be discarded, it cannot be defined as a “hazardous secondary material” per 40 CFR § 260.10 nor would it be identified as a “recyclable material” per § 261.6(a)(1). Therefore, claiming the exemption is moot.
- Skimmings – Since the material is not a hazardous waste per the RCRA waste analysis found in Attachment 2, it cannot be a “hazardous secondary material” per 40 CFR § 260.10 nor would it be known as a “recyclable material” per § 261.6(a)(1). Therefore, an exemption need not be claimed.
- Quench Water Solids – When discarding the material, it would not be identified as a hazardous waste; therefore, it cannot be a “hazardous secondary material” per 40 CFR § 260.10 nor would it fall under the realm of a “recyclable material” per § 261.6(a)(1). Therefore, the exemption does not apply.



- Flux – Since the material is not a hazardous waste if discarded per the RCRA waste analysis found in Attachment 2, it cannot be identified as a “hazardous secondary material” per 40 CFR § 260.10 nor would it be known as a “recyclable material” per § 261.6(a)(1). The exemption is moot.

5. *If RBG is claiming the zinc fertilizer exclusion for any of the above-mentioned materials, state whether RBG has submitted, to either the U.S. EPA or Illinois Environmental Protection Agency (IEPA), a one-time notice that contains RBG's name, address, and USEPA identification number; provides a brief description of the secondary material that will be subject to the exclusion; and which identifies when RBG intended to begin managing excluded zinc-bearing hazardous secondary materials under the conditions of the exclusion.*

Since the above-mentioned materials are not hazardous wastes if they were to be disposed, the zinc fertilizer exclusion does not apply and submission of the above-information is not needed.

6. *If the answer to 5, above, is affirmative, provide a true and accurate copy of the notice(s).*

Not applicable.

7. *If RBG is claiming the zinc fertilizer exclusion for any of the above-mentioned materials, state whether, with each off-site shipment of excluded hazardous secondary material, RBG provides written notice to the receiving facility stating that the material is subject to the conditions of 35 IAC § 721.104(a)(20) [40 C.F.R. § 261.4(a)(20)].*

Since the above-mentioned materials used to make fertilizer do not meet the definition of hazardous secondary materials, to the best of our knowledge a written notice to the receiving facility stating that the materials are subject to the above-referenced conditions is not needed.

8. *If the answer to 7, above, is affirmative, provide a true and accurate copy of the last such notification to each of the receiving facilities.*

Not applicable.

9. *State whether RBG maintains, for no less than three years, records of all off-site shipments of its bottom dross, zinc skimmings, quench water tank solids, and spent flux (black sal) which include the following information:*

- (a) Name of the transporter and date of the shipment;*
- (b) Name and address of the facility that received the material, and documentation confirming receipt of the shipment; and*
- (c) Type and quantity of material in each shipment.*

For its own internal purposes, Rogers Brothers maintains all records of off-site shipments of its bottom dross, zinc skimmings, quench water tank solids and spent flux (black sal).

10. *If the answer to 9, above, is affirmative, provide true and accurate copies of these records for one year period immediately preceding your receipt of this request for information.*

This request is not applicable because the materials are not hazardous secondary materials and are not subject to record keeping requirements. However, if the U.S. EPA would still like copies of the records, the information will be submitted.

11. *State whether RBG has determined if its bottom dross, zinc skimmings, quench water tank solids, and spent flux (black sal) possess the characteristic of toxicity, and is therefore a hazardous waste, as described at 35 IAC § 721.124 [40 C.F.R. § 261.24].*

Pursuant to the material analysis in Attachment 2, the four materials listed above do not possess the characteristic of toxicity, pH or flashpoint, and therefore, would not be hazardous wastes if discarded.

12. *If the answer to 11, above, is affirmative, provide true and accurate copies of the records that document the results of those determinations (e.g., analytical reports).*

Please reference Attachment 2.

13. *If the answer to 11, above, is affirmative, and the Toxicity Characteristic Leaching Procedure (TCLP) was not used in making the determinations; but instead, RBG made the determinations through application of its knowledge of the hazard characteristic of the secondary materials in light of the materials or processes used, provide a detailed explanation of the basis for that knowledge.*

Rogers used its knowledge of the characteristic of toxicity for mercury. Mercury is not used in any of Rogers processes nor is the metal contained in any of Roger's raw materials; therefore, the analysis was not conducted.

14. *Provide the following certification by a responsible corporate officer:*

*I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*

Such certification can be found in Attachment 1.

We trust the above response satisfies your request for information. If you have any further questions or need any clarification on the above information, please do not hesitate to contact me at (815) 877-7530. Thank you.

Mr. Todd Brown  
February 18, 2014  
Page 7

Sincerely,

ENVIRONMENTAL COMPLIANCE CONSULTING, LTD.



Thomas J. McNamee  
President

TJM/mlf  
Attachments (2)

cc: Mr. Michael McKinnon/Rogers Brothers Galvanizing (via U.S. First Class Mail)  
File: EPA Response 0218 2014

# **Attachment 1**

## **Certification by Responsible Corporate Officer**

## Certification

**Rogers Brothers  
1925 Kishwaukee Street  
Rockford, Illinois 61104**

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Authorized

Representative Signature:

Michael R McKinnon  
**Mike McKinnon, President**

2-18-14  
**Date**



## **Attachment 2**

# **Laboratory Report**

# TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

## ANALYTICAL REPORT

TestAmerica Laboratories, Inc.

TestAmerica Chicago

2417 Bond Street

University Park, IL 60484

Tel: (708)534-5200

TestAmerica Job ID: 500-71516-1

Client Project/Site: RBI

For:

Environmental Compliance Consulting LTD

334 East Riverside Blvd

Loves Park, Illinois 61111

Attn: Mr. Thomas McNamee



Authorized for release by:

2/17/2014 3:36:44 PM

Robin Kintz, Project Manager II

(708)534-5200

[robinm.kintz@testamericainc.com](mailto:robinm.kintz@testamericainc.com)

### LINKS

Review your project  
results through

Total Access

Have a Question?



Ask  
The  
Expert

Visit us at:

[www.testamericainc.com](http://www.testamericainc.com)

*The test results in this report meet all 2003 NELAC and 2009 TNI requirements for accredited parameters, exceptions are noted in this report. This report may not be reproduced except in full, and with written approval from the laboratory. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.*

*This report has been electronically signed and authorized by the signatory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.*

*Results relate only to the items tested and the sample(s) as received by the laboratory.*



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## Case Narrative

Client: Environmental Compliance Consulting LTD  
Project/Site: RBI

TestAmerica Job ID: 500-71516-1

Job ID: 500-71516-1

Laboratory: TestAmerica Chicago

### Narrative

---

#### Job Narrative 500-71516-1

#### Comments

No additional comments.

#### Receipt

The samples were received on 2/13/2014 10:35 AM; the samples arrived in good condition, properly preserved and, where required, on ice. The temperature of the cooler at receipt was 5.2° C.

#### Metals

Method(s) 6010C: The ICVL at line 8 in 6010C batch 223492 was outside the method acceptance limits of 70-130% recovery for Seat 132%. The samples 500-71516-1,2,3,4 and 5 were bracketed. All the samples were below the RL of 0.05mg/L. The mid-range CCVs bracketing the data were all within the 90-110% recovery limits.

No other analytical or quality issues were noted.

#### General Chemistry

No analytical or quality issues were noted.

## Method Summary

Client: Environmental Compliance Consulting LTD  
Project/Site: RBI

TestAmerica Job ID: 500-71516-1

Method	Method Description	Protocol	Laboratory
6010C	Metals (ICP)	SW846	TAL CHI
9045C	pH	SW846	TAL CHI
D92	Flashpoint	ASTM	TAL CHI

### Protocol References:

ASTM = ASTM International

SW846 = "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

### Laboratory References:

TAL CHI = TestAmerica Chicago, 2417 Bond Street, University Park, IL 60484, TEL (708)534-5200





## Sample Summary

Client: Environmental Compliance Consulting LTD  
Project/Site: RBI

TestAmerica Job ID: 500-71516-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
500-71516-1	RBI-1.021114 (Dross)	Solid	02/11/14 15:30	02/13/14 10:35
500-71516-2	RBI-2.021114 (Skim)	Solid	02/11/14 15:15	02/13/14 10:35
500-71516-3	RBI-3.021114 (QTM)	Solid	02/11/14 15:15	02/13/14 10:35
500-71516-4	RBI-4.021114 (QTD)	Solid	02/11/14 15:15	02/13/14 10:35
500-71516-5	RBI-5.021114 (Flux)	Solid	02/11/14 15:30	02/13/14 10:35

5

## Client Sample Results

Client: Environmental Compliance Consulting LTD  
Project/Site: RBI

TestAmerica Job ID: 500-71516-1

Client Sample ID: RBI-1.021114 (Dross)

Lab Sample ID: 500-71516-1

Date Collected: 02/11/14 15:30

Matrix: Solid

Date Received: 02/13/14 10:35

### Method: 6010C - Metals (ICP) - TCLP

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	<0.050		0.050		mg/L		02/14/14 12:16	02/14/14 18:22	1
Barium	<0.50		0.50		mg/L		02/14/14 12:16	02/14/14 18:22	1
Cadmium	<0.0050		0.0050		mg/L		02/14/14 12:16	02/14/14 18:22	1
Chromium	<0.025		0.025		mg/L		02/14/14 12:16	02/14/14 18:22	1
Lead	<0.050		0.050		mg/L		02/14/14 12:16	02/14/14 18:22	1
Selenium	<0.050 ^		0.050		mg/L		02/14/14 12:16	02/14/14 18:22	1
Silver	<0.025		0.025		mg/L		02/14/14 12:16	02/14/14 18:22	1

### General Chemistry

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
pH	9.65		0.200		SU			02/14/14 11:20	1
Flashpoint	>200		40.0		Degrees F			02/16/14 20:10	1

## Client Sample Results

Client: Environmental Compliance Consulting LTD  
Project/Site: RBI

TestAmerica Job ID: 500-71516-1

Client Sample ID: RBI-2.021114 (Skim)

Lab Sample ID: 500-71516-2

Date Collected: 02/11/14 15:15

Matrix: Solid

Date Received: 02/13/14 10:35

### Method: 6010C - Metals (ICP) - TCLP

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	<0.050		0.050		mg/L		02/14/14 12:16	02/14/14 18:27	1
Barium	<0.50		0.50		mg/L		02/14/14 12:16	02/14/14 18:27	1
Cadmium	<0.0050		0.0050		mg/L		02/14/14 12:16	02/14/14 18:27	1
Chromium	<0.025		0.025		mg/L		02/14/14 12:16	02/14/14 18:27	1
Lead	<0.050		0.050		mg/L		02/14/14 12:16	02/14/14 18:27	1
Selenium	<0.050	<sup>A</sup>	0.050		mg/L		02/14/14 12:16	02/14/14 18:27	1
Silver	<0.025		0.025		mg/L		02/14/14 12:16	02/14/14 18:27	1

### General Chemistry

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
pH	6.21		0.200		SU			02/14/14 11:20	1
Flashpoint	>200		40.0		Degrees F			02/16/14 20:29	1

## Client Sample Results

Client: Environmental Compliance Consulting LTD  
Project/Site: RBI

TestAmerica Job ID: 500-71516-1

Client Sample ID: RBI-3.021114 (QTM)

Lab Sample ID: 500-71516-3

Date Collected: 02/11/14 15:15

Matrix: Solid

Date Received: 02/13/14 10:35

### Method: 6010C - Metals (ICP) - TCLP

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	<0.050		0.050		mg/L		02/14/14 12:16	02/14/14 18:32	1
Barium	<0.50		0.50		mg/L		02/14/14 12:16	02/14/14 18:32	1
Cadmium	<0.0050		0.0050		mg/L		02/14/14 12:16	02/14/14 18:32	1
Chromium	<0.025		0.025		mg/L		02/14/14 12:16	02/14/14 18:32	1
Lead	<0.050		0.050		mg/L		02/14/14 12:16	02/14/14 18:32	1
Selenium	<0.050	^	0.050		mg/L		02/14/14 12:16	02/14/14 18:32	1
Silver	<0.025		0.025		mg/L		02/14/14 12:16	02/14/14 18:32	1

### General Chemistry

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
pH	7.67		0.200		SU			02/14/14 11:20	1
Flashpoint	>200		40.0		Degrees F			02/16/14 20:48	1

# Client Sample Results

Client: Environmental Compliance Consulting LTD  
Project/Site: RBI

TestAmerica Job ID: 500-71516-1

Client Sample ID: RBI-4.021114 (QTD)

Lab Sample ID: 500-71516-4

Date Collected: 02/11/14 15:15

Matrix: Solid

Date Received: 02/13/14 10:35

## Method: 6010C - Metals (ICP) - TCLP

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	<0.050		0.050		mg/L		02/14/14 12:16	02/14/14 18:37	1
Barium	<0.50		0.50		mg/L		02/14/14 12:16	02/14/14 18:37	1
Cadmium	<0.0050		0.0050		mg/L		02/14/14 12:16	02/14/14 18:37	1
Chromium	<0.025		0.025		mg/L		02/14/14 12:16	02/14/14 18:37	1
Lead	<0.050		0.050		mg/L		02/14/14 12:16	02/14/14 18:37	1
Selenium	<0.050 ^		0.050		mg/L		02/14/14 12:16	02/14/14 18:37	1
Silver	<0.025		0.025		mg/L		02/14/14 12:16	02/14/14 18:37	1

## General Chemistry

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
pH	9.51		0.200		SU			02/14/14 11:20	1
Flashpoint	>200		40.0		Degrees F			02/16/14 21:07	1

TestAmerica Chicago



## Client Sample Results

Client: Environmental Compliance Consulting LTD  
Project/Site: RBI

TestAmerica Job ID: 500-71516-1

Client Sample ID: RBI-5.021114 (Flux)

Lab Sample ID: 500-71516-5

Date Collected: 02/11/14 16:30

Matrix: Solid

Date Received: 02/13/14 10:35

### Method: 6010C - Metals (ICP) - TCLP

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	<0.050		0.050		mg/L		02/14/14 12:16	02/14/14 18:42	1
Barium	<0.50		0.50		mg/L		02/14/14 12:16	02/14/14 18:42	1
Cadmium	<0.0050		0.0050		mg/L		02/14/14 12:16	02/14/14 18:42	1
Chromium	<0.025		0.025		mg/L		02/14/14 12:16	02/14/14 18:42	1
Lead	<0.050		0.050		mg/L		02/14/14 12:16	02/14/14 18:42	1
Selenium	<0.050	^	0.050		mg/L		02/14/14 12:16	02/14/14 18:42	1
Silver	<0.025		0.025		mg/L		02/14/14 12:16	02/14/14 18:42	1

### General Chemistry

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
pH	5.42		0.200		SU			02/14/14 11:20	1
Flashpoint	>200		40.0		Degrees F			02/16/14 21:26	1

## Definitions/Glossary

Client: Environmental Compliance Consulting LTD  
Project/Site: RBI

TestAmerica Job ID: 500-71516-1

### Qualifiers

#### Metals

Qualifier	Qualifier Description
A	ICV,CCV,ICB,CCB, ISA, ISB, CRI, CRA, DLCK or MRL standard: Instrument related QC exceeds the control limits.

### Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
□	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CNF	Contains no Free Liquid
DER	Duplicate error ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision level concentration
MDA	Minimum detectable activity
EDL	Estimated Detection Limit
MDC	Minimum detectable concentration
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
NC	Not Calculated
ND	Not detected at the reporting limit (or MDL or EDL if shown)
PQL	Practical Quantitation Limit
QC	Quality Control
RER	Relative error ratio
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)

## QC Association Summary

Client: Environmental Compliance Consulting LTD  
Project/Site: RBI

TestAmerica Job ID: 500-71516-1

### Metals

#### Leach Batch: 223204

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
500-71516-1	RBI-1.021114 (Dross)	TCLP	Solid	1311	
500-71516-5	RBI-5.021114 (Flux)	TCLP	Solid	1311	
LB 500-223204/1-B	Method Blank	TCLP	Solid	1311	

#### Leach Batch: 223205

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
500-71516-2	RBI-2.021114 (Skim)	TCLP	Solid	1311	
500-71516-3	RBI-3.021114 (QTM)	TCLP	Solid	1311	
500-71516-4	RBI-4.021114 (QTD)	TCLP	Solid	1311	
LB2 500-223205/1-B	Method Blank	TCLP	Solid	1311	

#### Prep Batch: 223348

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
500-71516-1	RBI-1.021114 (Dross)	TCLP	Solid	3010A	223204
500-71516-2	RBI-2.021114 (Skim)	TCLP	Solid	3010A	223205
500-71516-3	RBI-3.021114 (QTM)	TCLP	Solid	3010A	223205
500-71516-4	RBI-4.021114 (QTD)	TCLP	Solid	3010A	223205
500-71516-5	RBI-5.021114 (Flux)	TCLP	Solid	3010A	223204
LB 500-223204/1-B	Method Blank	TCLP	Solid	3010A	223204
LB2 500-223205/1-B	Method Blank	TCLP	Solid	3010A	223205
LCS 500-223348/3-A	Lab Control Sample	Total/NA	Solid	3010A	

#### Analysis Batch: 223492

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
500-71516-1	RBI-1.021114 (Dross)	TCLP	Solid	6010C	223348
500-71516-2	RBI-2.021114 (Skim)	TCLP	Solid	6010C	223348
500-71516-3	RBI-3.021114 (QTM)	TCLP	Solid	6010C	223348
500-71516-4	RBI-4.021114 (QTD)	TCLP	Solid	6010C	223348
500-71516-5	RBI-5.021114 (Flux)	TCLP	Solid	6010C	223348
LB 500-223204/1-B	Method Blank	TCLP	Solid	6010C	223348
LB2 500-223205/1-B	Method Blank	TCLP	Solid	6010C	223348
LCS 500-223348/3-A	Lab Control Sample	Total/NA	Solid	6010C	223348

### General Chemistry

#### Analysis Batch: 223381

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
500-71516-1	RBI-1.021114 (Dross)	Total/NA	Solid	9045C	
500-71516-2	RBI-2.021114 (Skim)	Total/NA	Solid	9045C	
500-71516-3	RBI-3.021114 (QTM)	Total/NA	Solid	9045C	
500-71516-4	RBI-4.021114 (QTD)	Total/NA	Solid	9045C	
500-71516-4 DU	RBI-4.021114 (QTD)	Total/NA	Solid	9045C	
500-71516-5	RBI-5.021114 (Flux)	Total/NA	Solid	9045C	

#### Analysis Batch: 223480

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
500-71516-1	RBI-1.021114 (Dross)	Total/NA	Solid	D92	
500-71516-2	RBI-2.021114 (Skim)	Total/NA	Solid	D92	
500-71516-3	RBI-3.021114 (QTM)	Total/NA	Solid	D92	
500-71516-4	RBI-4.021114 (QTD)	Total/NA	Solid	D92	

TestAmerica Chicago

## QC Association Summary

Client: Environmental Compliance Consulting LTD  
Project/Site: RBI

TestAmerica Job ID: 500-71516-1

### General Chemistry (Continued)

Analysis Batch: 223480 (Continued)

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
500-71516-5	RBI-5.021114 (Flux)	Total/NA	Solid	D92	



# QC Sample Results

Client: Environmental Compliance Consulting LTD  
Project/Site: RBI

TestAmerica Job ID: 500-71516-1

## Method: 6010C - Metals (ICP)

Lab Sample ID: LCS 500-223348/3-A  
Matrix: Solid  
Analysis Batch: 223492

Client Sample ID: Lab Control Sample  
Prep Type: Total/NA  
Prep Batch: 223348

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
Arsenic	0.100	0.100		mg/L		100	80 - 120
Barium	0.500	0.505		mg/L		101	80 - 120
Cadmium	0.0500	0.0495		mg/L		99	80 - 120
Chromium	0.200	0.192		mg/L		96	80 - 120
Lead	0.100	0.101		mg/L		101	80 - 120
Selenium	0.100	0.0994 ^		mg/L		99	80 - 120
Silver	0.0500	0.0488		mg/L		98	80 - 120

Lab Sample ID: LB 500-223204/1-B  
Matrix: Solid  
Analysis Batch: 223492

Client Sample ID: Method Blank  
Prep Type: TCLP  
Prep Batch: 223348

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	<0.050		0.050		mg/L		02/14/14 12:16	02/14/14 16:58	1
Barium	<0.50		0.50		mg/L		02/14/14 12:16	02/14/14 16:58	1
Cadmium	<0.0050		0.0050		mg/L		02/14/14 12:16	02/14/14 16:58	1
Chromium	<0.025		0.025		mg/L		02/14/14 12:16	02/14/14 16:58	1
Lead	<0.050		0.050		mg/L		02/14/14 12:16	02/14/14 16:58	1
Selenium	<0.050 ^		0.050		mg/L		02/14/14 12:16	02/14/14 16:58	1
Silver	<0.025		0.025		mg/L		02/14/14 12:16	02/14/14 16:58	1

Lab Sample ID: LB2 500-223205/1-B  
Matrix: Solid  
Analysis Batch: 223492

Client Sample ID: Method Blank  
Prep Type: TCLP  
Prep Batch: 223348

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	<0.050		0.050		mg/L		02/14/14 12:16	02/14/14 17:03	1
Barium	<0.50		0.50		mg/L		02/14/14 12:16	02/14/14 17:03	1
Cadmium	<0.0050		0.0050		mg/L		02/14/14 12:16	02/14/14 17:03	1
Chromium	<0.025		0.025		mg/L		02/14/14 12:16	02/14/14 17:03	1
Lead	<0.050		0.050		mg/L		02/14/14 12:16	02/14/14 17:03	1
Selenium	<0.050 ^		0.050		mg/L		02/14/14 12:16	02/14/14 17:03	1
Silver	<0.025		0.025		mg/L		02/14/14 12:16	02/14/14 17:03	1

## Method: 9045C - pH

Lab Sample ID: 500-71516-4 DU  
Matrix: Solid  
Analysis Batch: 223381

Client Sample ID: RBI-4.021114 (QTD)  
Prep Type: Total/NA

Analyte	Sample Result	Sample Qualifier	DU Result	DU Qualifier	Unit	D	RPD	Limit
pH	9.51		9.520		SU		0.1	

TestAmerica Chicago

## Lab Chronicle

Client: Environmental Compliance Consulting LTD  
Project/Site: RBI

TestAmerica Job ID: 500-71516-1

Client Sample ID: RBI-1.021114 (Dross)

Lab Sample ID: 500-71516-1

Date Collected: 02/11/14 15:30

Matrix: Solid

Date Received: 02/13/14 10:35

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
TCLP	Leach	1311			223204	02/13/14 14:30	CMV	TAL CHI
TCLP	Prep	3010A			223348	02/14/14 12:16	LA1	TAL CHI
TCLP	Analysis	6010C		1	223492	02/14/14 18:22	PJ1	TAL CHI
Total/NA	Analysis	9045C		1	223381		JLE	TAL CHI
					(Start)	02/14/14 11:20		
					(End)	02/14/14 13:30		
Total/NA	Analysis	D92		1	223480		SJS	TAL CHI
					(Start)	02/16/14 20:10		
					(End)	02/16/14 20:29		

Client Sample ID: RBI-2.021114 (Skim)

Lab Sample ID: 500-71516-2

Date Collected: 02/11/14 15:15

Matrix: Solid

Date Received: 02/13/14 10:35

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
TCLP	Leach	1311			223205	02/13/14 14:30	CMV	TAL CHI
TCLP	Prep	3010A			223348	02/14/14 12:16	LA1	TAL CHI
TCLP	Analysis	6010C		1	223492	02/14/14 18:27	PJ1	TAL CHI
Total/NA	Analysis	9045C		1	223381		JLE	TAL CHI
					(Start)	02/14/14 11:20		
					(End)	02/14/14 13:30		
Total/NA	Analysis	D92		1	223480		SJS	TAL CHI
					(Start)	02/16/14 20:29		
					(End)	02/16/14 20:48		

Client Sample ID: RBI-3.021114 (QTM)

Lab Sample ID: 500-71516-3

Date Collected: 02/11/14 15:15

Matrix: Solid

Date Received: 02/13/14 10:35

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
TCLP	Leach	1311			223205	02/13/14 14:30	CMV	TAL CHI
TCLP	Prep	3010A			223348	02/14/14 12:16	LA1	TAL CHI
TCLP	Analysis	6010C		1	223492	02/14/14 18:32	PJ1	TAL CHI
Total/NA	Analysis	9045C		1	223381		JLE	TAL CHI
					(Start)	02/14/14 11:20		
					(End)	02/14/14 13:30		
Total/NA	Analysis	D92		1	223480		SJS	TAL CHI
					(Start)	02/16/14 20:48		
					(End)	02/16/14 21:07		

TestAmerica Chicago

## Lab Chronicle

Client: Environmental Compliance Consulting LTD  
Project/Site: RBI

TestAmerica Job ID: 500-71516-1

Client Sample ID: RBI-4.021114 (QTD)

Lab Sample ID: 500-71516-4

Date Collected: 02/11/14 15:15

Matrix: Solid

Date Received: 02/13/14 10:35

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
TCLP	Leach	1311			223205	02/13/14 14:30	CMV	TAL CHI
TCLP	Prep	3010A			223348	02/14/14 12:16	LA1	TAL CHI
TCLP	Analysis	6010C		1	223492	02/14/14 18:37	PJ1	TAL CHI
Total/NA	Analysis	9045C		1	223381		JLE	TAL CHI
					(Start)	02/14/14 11:20		
					(End)	02/14/14 13:30		
Total/NA	Analysis	D92		1	223480		SJS	TAL CHI
					(Start)	02/16/14 21:07		
					(End)	02/16/14 21:26		

Client Sample ID: RBI-5.021114 (Flux)

Lab Sample ID: 500-71516-5

Date Collected: 02/11/14 15:30

Matrix: Solid

Date Received: 02/13/14 10:35

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
TCLP	Leach	1311			223204	02/13/14 14:30	CMV	TAL CHI
TCLP	Prep	3010A			223348	02/14/14 12:16	LA1	TAL CHI
TCLP	Analysis	6010C		1	223492	02/14/14 18:42	PJ1	TAL CHI
Total/NA	Analysis	9045C		1	223381		JLE	TAL CHI
					(Start)	02/14/14 11:20		
					(End)	02/14/14 13:30		
Total/NA	Analysis	D92		1	223480		SJS	TAL CHI
					(Start)	02/16/14 21:26		
					(End)	02/16/14 21:45		

### Laboratory References:

TAL CHI = TestAmerica Chicago, 2417 Bond Street, University Park, IL 60484, TEL (708)534-5200



## Certification Summary

Client: Environmental Compliance Consulting LTD  
Project/Site: RBI

TestAmerica Job ID: 500-71516-1

### Laboratory: TestAmerica Chicago

All certifications held by this laboratory are listed. Not all certifications are applicable to this report.

Authority	Program	EPA Region	Certification ID	Expiration Date
Alabama	State Program	4	40461	04-30-14
California	NELAP	9	01132CA	04-30-14 *
Georgia	State Program	4	N/A	04-30-14
Hawaii	State Program	9	N/A	04-30-14
Illinois	NELAP	5	100201	04-30-14
Indiana	State Program	5	C-IL-02	04-30-14 *
Iowa	State Program	7	82	05-01-14 *
Kansas	NELAP	7	E-10161	10-31-14
Kentucky (UST)	State Program	4	66	04-30-14
Louisiana	NELAP	6	30720	06-30-14
Massachusetts	State Program	1	M-IL035	06-30-14
Mississippi	State Program	4	N/A	04-30-14
North Carolina DENR	State Program	4	291	12-31-14
North Dakota	State Program	8	R-194	04-30-14
Oklahoma	State Program	6	8908	08-31-14
South Carolina	State Program	4	77001	04-30-14
Texas	NELAP	6	T104704252-09-TX	02-28-14
USDA	Federal		P330-12-00038	02-06-15
Wisconsin	State Program	5	999580010	08-31-14
Wyoming	State Program	8	8TMS-Q	04-30-14

\* Expired certification is currently pending renewal and is considered valid.

TestAmerica Chicago

2/17/2014

## Login Sample Receipt Checklist

Client: Environmental Compliance Consulting LTD

Job Number: 500-71516-1

Login Number: 71516

List Source: TestAmerica Chicago

List Number: 1

Creator: Scott, Sherri L

Question	Answer	Comment
Radioactivity wasn't checked or is $\leq$ background as measured by a survey meter.	True	
The cooler's custody seal, if present, is intact.	True	
Sample custody seals, if present, are intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	5.2
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time.	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is $<6\text{mm}$ ( $1/4''$ ).	N/A	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	N/A	

May 2, 2014

**Via Electronic Mail**  
**brown.todd@epa.gov**

**&**

**U.S. First Class Mail**

Mr. Todd Brown  
U.S. Environmental Protection Agency  
77 West Jackson Boulevard, LR-8J  
Chicago, Illinois 60604

Re: Rogers Brothers Galvanizing, Inc.  
1925 Kishwaukee Street  
Rockford, Illinois 61104  
EPA ID No.: ILD005113063  
*Second Response to Notice of Violation Dated 3/05/2014*

Dear Mr. Brown:

In our recent telephone conversation, you had asked for additional information related to Environmental Compliance Consulting, Ltd.'s April 9, 2014 response to the *Notice of Violation* ("NOV") for Rogers Brothers Galvanizing, Inc. It was indicated in the NOV that the satellite containers of oil skimmings located adjacent to the two (2) sulfuric acid tanks were not labeled with the words "Hazardous Waste" and were not closed. Our response indicated that the waste was nonhazardous based on a laboratory report showing the pH to be above 2.0. However, you pointed out in our telephone conversation that the analytical report we sent was for a material that was a solid and did not appear to represent the oil skimmings.

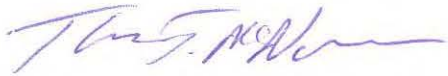
We would like to further elaborate and report that the pH value appears to fluctuate near the threshold of 2.0 dependant upon the age of the bath and the amount of make-up sulfuric acid added. Therefore, to err on the side of caution, Roger's is treating the material as a hazardous waste and will make certain that the container is closed when waste is not being added or removed. Please know that the facility is experiencing trouble keeping a hazardous waste label affixed to the outside of the steel drum because an oily film accumulates on the surface. Rogers is proposing to advertise the danger posed by the satellite container by permanently affixing a label with the words "Hazardous Waste" and other information to a permanent fixed surface immediately adjacent to the drum. This would serve both the purpose of informing employees of the nature of the waste and solving the problem of the label falling off the drum because of the oil issue.

As a former RCRA Inspector for the Illinois EPA, I would agree to this application but we would like your blessing as to whether or not the U.S. EPA would accept this practice as a solution to the problem. If you have any questions concerning this reply or need any additional information to explain the actions taken in response to these issues, please do not hesitate to contact me. I can be reached at (815) 877-7530. Thank you for your assistance.

Mr. Todd Brown  
May 2, 2014  
Page 2

Sincerely,

ENVIRONMENTAL COMPLIANCE CONSULTING, LTD.



Thomas J. McNamee  
President

TJM/mlf

cc: Mr. Michael McKinnon/Rogers Brothers Galvanizing (via U.S. First Class Mail)  
File: EPA Response #2 0409 2014



**Today's Date:** October 22, 2015

**Site Name:** Rogers Brothers, Inc.

**ID Number:** ILD005113063

**Date(s) of Documents:** 2013 through 2014

**Type(s) of Document:** Compliance Monitoring Documents

**Quantity of Documents:** **No. of Boxes:** 0 **No. of Folders:** 0

**Sensitive: CBI Room:** No                      **Enforcement Sensitive (Red Folder):** No

**Documents can go to Federal Record Center:** \_\_\_\_\_  
(Documents from FRC can be recalled in 48 - 72 hours)

**Duplicates Returned to you:** No

Submitted by: Todd Brown

**Telephone Number:** (312)886-6091

**Comments:** \_\_\_\_\_



ILD00513063

RCRA Inspection Notes.

Rogers Brothers, Inc.

1925 Kishwaukee Street  
Rockford, IL 61104

May 29, 2013

This book is the property  
of the U.S. EPA.

If found, mail to:

77 W. Jackson Blvd,  
Chicago, IL 60604

Mail code LR-85.

All  
wer  
U.S.  
with  
Reg  
on M

Property  
EPA.  
to:

Kson Blvd,  
L 60604,  
UR-85.

1

All notes contained here-in  
were made by Todd C. Brown,  
U.S. EPA, Region 5, in conjunction  
with an EPA inspection of  
Rogers Brothers Galvanizing, Rockford, IL  
on May 29<sup>th</sup>, 2013.

Todd Brown

1

1

2

This Page  
intentionally left blank.

**Illinois Environmental Protection Agency**

4302 NORTH MAIN STREET  
ROCKFORD, ILLINOIS 61103

**Greg Kazmerski**

Environmental Protection Specialist  
Bureau of Land

815/987-7760  
815/987-7005 FAX

Website: [www.epa.state.il.us](http://www.epa.state.il.us)  
E-Mail: [Greg.Kazmerski@illinois.gov](mailto:Greg.Kazmerski@illinois.gov)

**ROGERS  
BROTHERS  
GALVANIZING**



**MICHAEL R. McKINNON**  
PRESIDENT

**HOT DIP GALVANIZING**  
1925 Kishwaukee St.  
Rockford, IL 61104  
[mike@rogersbrothers.com](mailto:mike@rogersbrothers.com)

ISO 9001: 2008 Certified

815/965-5132  
Fax: 815/965-3765  
[www.rogersbrothers.com](http://www.rogersbrothers.com)

JB

Arrive

Opening

Greg

Zn

hot

Acid

Flu

not



3

Arrival 9:46 AM on May 29,  
2013

Opening with

Tom Ferolie  
Operations Manager

Greg Kazmerski - TEPA

Zn Ferrous Sulfide

Not handle as hazardous

Acid recycling system  
from sulfuric acid.

Not sure of pH.

JLB

4

# Hot Dip Galvanizing.

Steel-Carbon

- 1) Put into sulfuric acid for clean & rinse
- 2)  $\text{NaOH}$  clean & rinse
- 3) Flux  $\text{ZnNH}_4\text{Cl}$  - prevents oxidation
- 4) Molten zinc -  $850^\circ\text{F}$
- 5) Quenched with water
- 6) off to container

3 separate <sup>Kettles</sup> ~~tin~~ for same process <sup>SB</sup> galvanizing.

no cyanide

*JB*

Zn  
rec

Ac

Zn

Co

off

all

no  
fr

oil  
off

Slu  
C  
a



7.

acid for

+ rinse

1. - prevents  
sticking

850°F

water

men

SB for  
galvanizing.

Zn ferrous sulfide from  
recycle of sulfuric

Acid Chilled

Zn + iron fall out

Centrifuge

off in super sacks

all closed system

no waste water  
treatment.

oil waste skimmed  
off of acid tanks

Sludge from tank  
cleanouts - once  
a year or so.

JB

6

over last 5 years

lead has been cut  
out from process

1) Acid at some point  
cannot be used  
B shipped off as  
haz.

2) oil skimming

3) Sludge from sodium hydroxide  
+ float tank

4) parts washer - Safety/Klean

JB

~ 500

Lead

2-4  
of  
lb

still

Zn Fe  
+ an

Down

AD va

or S

Storage  
Geed



~ 500 lbs oil sludge  
would need to

2-4 tank loads  
of sulfuric acid  
by 6 months.  
still LQO.

Zn ferrous sulfate - fertilizer  
+ animal feed,

Drum storage for waste

Advanced waste  
or Safety Kleen

Storage tanks for  
lead before recycled.

JB

4

1) Fork lift slop generates  
Used oil.

2) Fluorescent lamps to  
Safety Kleen

Non haz waste. Per  
recycle

+ Dross from <sup>Zn</sup> Kettles.  
Bottom dross

+ Zn skimmings - oxidized  
material on top of  
Kettles

Several buyers for dross  
~~take zinc~~ + Zn skimmings

off for recycle.

JB

1995

2

3

Jack  
or

Michael  
was  
met  
+ ge

10:15

1925

2007



generators

up to

ste. per

2<sup>nd</sup> Kettles.

S

- oxidized  
top of

for dross  
- 2<sup>nd</sup> skimming

de.

~ 95 employees

2 production shift

3<sup>rd</sup> shift is rather  
maintenance.

Jacobs - nuts/bolts  
are biggest customer

---

Michael R. McKinnon  
was not present for  
meeting but introduced  
+ gave Carl.

---

10:17 am - walk thru

1925 Bldg.

2007 Bldg. - process

JB

Storage area

8 tote sacks  
of Zinc Iron Sulfate  
from Acid recycling  
system.

All have a liability

5/21 - 5/29 date  
range.

photos 1 - all bkg  
photo 2 - label.

JB

Photo  
line  
on

L

pl

for

Cont  
Coll

01

L

sacks  
iron sulfate  
recycling

lillards

7 date

all peg  
label.

11  
Photo 3: Hydrated  
lime container +  
unknown material.

→ open

Photo 4 is unknown  
from top.

product slugs

Container for  
collection of used

OIL - no visible label

→ Photo 5.

JB



12

14 Containers of  
Quercus tank Clean-out.  
solids.

sent for recycle.

photo 6

---

Nearly - Zn skimmings  
from galvanizing tank  
→ photo 7

---

Out side - trailer  
of Dress from  
Kettles

→ photo 8

JB

Drum

Salt

off

L

Proc

Zn  
m

h  
10

s of  
Clean-out.

relie.

Drums of Black  
Salt in trailer  
off for recycle  
↳ photo 9.

### Processing

Skimmings  
y tank

Zn ammonia chloride  
melted on top  
of Zn kettles to  
help ~~with acid~~  
keep parts clean  
& prevent oxidation.

ailer  
m

eventual skimmed  
off & forms  
"Black Salt"

JB



14

open 55 gallon drum  
unlabeled of oil skim  
from sulfuric bath.

Photo 10

Photo 11 - second of  
same

4 tanks store/feed  
acid to sulfuric  
recycle.

appears to be security  
containment.

labeled as to  
contents.

large tank in

same area holds  
overhead water.

Photo 12 + B

are tanks.

Bert

Paul

B

e

11:00

Per

Man

2013

1700

Su

Sa

Batch process

Daily process

Start filling on Monday  
empty by Friday

---

11:00 am. Back to office  
for record review

---

Manifest Review

2013 Manifests -  
two waste streams

Waste Corrosive liquid  
Sulfuric acid, Lead  
Diox, Diox, Diox

SS pallets at  
at time

Ship out once  
or twice per month.

Safety Klean in Bolton

7LD980613913 JB



16

2) Spent waste Sulfuric  
Acid (D002, D006, D008)

2 shipments on 5/24/13  
tanker truck  
3,400  
3,500

Both to Vicker  
Environmental OH  
OHD020273819

Manifests on site  
going back 3 years

---

Analysis from 2000

Arsenic  $< 5 \text{ mg/Kg}$   
Barium  $8.8 \text{ mg/Kg}$

Cadmium  $5.8 \text{ mg/Kg}$

Chromium  $21.2 \text{ mg/Kg}$

JPB

the sulfate  
(D006, D008)  
s on 5/24/13  
ck

ckery OH  
0273819

5-1-  
3 years

from 2000  
mg/kg  
mg/kg  
8 mg/kg  
2 mg/kg

level 26.3 mg/kg  
Hg < 5.0 mg/kg  
Selenium < 5.0 mg/kg  
Silver < 5.0 mg/kg

Obtain total  
metal ANALYSIS.

Boils maintained for  
Zinc Iron Sulfate shipments  
for fertilizer back  
until at least  
2010

Obtain ~~10~~ 2 copies  
from 2013. For  
the two receivers.

JB



Annual Reports onsite  
Back to 2012

fertilizer onsite  
for 1 to 2 weeks  
before shipment.

Confirmation of receipt  
not received.

NO notification to  
EPA.

NO notification of  
shipment to receiver.

Contingency Plan

ECs = Tom  
+ Agapito Chaves

no address for Chaves.

JB

is onsite  
did

site  
yells  
met

of receipt

tion to

in of  
to recover

an

into caves

for caves

TRAINING Docs  
On site,

- SSN in
- descrip
- job title
- name of employee

Received list of  
companies getting

Dress  
Skinnys  
Spent Flux  
Black SAL or Black Salt

Black SAL + Spent Flux  
will be looked

Dress + Skinnys - metals cut  
rest is  
fertilizing  
↓  
turned  
- into  
2 in powder

LB



20

2) Satellite drums

1) Describe agreement,  
with local authorities

Went over ISSUE

will follow up about

Zn fertiliz. issue.

at 12:15.

Out at 12:30

AB

## LAND AND CHEMICALS DIVISION

Type of Document: Notice of ViolationName of Document: Rogers Brothers Galvanizing (ILD005113063)

	NAMES	DATE
AUTHOR:	<u>Ed Brown</u>	<u>2/27/14</u>
SECTION APA:	<u>[Signature]</u>	<u>2/27/14</u>
SECTION CHIEF:	<u>[Signature]</u>	<u>2/27/14</u>
BRANCH APA:	<u>R. Aridge RA</u>	<u>3/5/14</u>
BRANCH CHIEF:	<u>[Signature]</u>	<u>3/5/14</u>
DIVISION APA:	_____	_____
DIVISION DIRECTOR:	_____	_____
OTHERS:	_____	_____
	_____	_____
DRA:	_____	_____
RA:	_____	_____
RETURN TO:	_____	_____
PHONE:	_____	_____

COMMENTS:

State communication email sent 2/28/14.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_



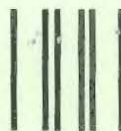
UNITED STATES POSTAL SERVICE

CARDI STREAM

IL 601

07 MAR '14

0121



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Todd Brown  
U.S EPA/ Region 5 - LR-8J  
77 W. Jackson Blvd  
Chicago, IL 60604

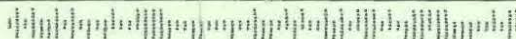
RECEIVED

DIVISION FRONT OFFICE

MAR 11 2014

LAND AND CHEMICALS DIVISION  
U.S. EPA - REGION 5

0604350893



## SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Michael R. McKinnon / President  
Rogers Brothers Galvanizing  
1925 Kiswaukee Street  
Rockford, Illinois 61104

## COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

Disiecky

C. Date of Delivery

3/7/14

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ NoMail ☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number

(Transfer from service label)

7009 1680 0000 7663 6902





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

MAR 05 2014

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED 7009 1680 0000 7663 6902**

Mr. Michael R. McKinnon  
President  
Rogers Brothers Galvanizing  
1925 Kishwaukee Street  
Rockford, Illinois 61104

Re: Notice of Violation  
Rogers Brothers Galvanizing  
EPA ID No.: ILD005113063

Dear Mr. McKinnon:

On May 29, 2013, a representative of the U.S. Environmental Protection Agency inspected the Rogers Brothers Galvanizing (RBG) facility located in Rockford, Illinois. The purpose of the inspection was to evaluate RBG's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. We have enclosed a copy of the inspection report for your reference.

Based on information provided by RBG personnel, review of records, and physical observations made by the inspector at the time of the inspection, EPA has determined that RBG is engaged in the storage of hazardous waste without a permit, and is in violation of certain requirements of the Illinois Administrative Code (IAC) and United States Code of Federal Regulations (C.F.R.). To be eligible for the exemption from having a hazardous waste storage permit, RBG must be in compliance with the conditions of 35 IAC §§ 722.134(a) and (c) [40 CFR §§ 262.34(a) and (c)]. We find that RBG was not in compliance with the following conditions for a hazardous waste storage permit exemption, and in violation of the following requirements:

1. A generator must determine whether a waste it generates is a hazardous waste. See, 35 IAC § 722.111 [40 C.F.R. § 262.11]. At the time of the inspection, RBG had not made a hazardous waste determination on unknown solid material inside of a rusty, dented and open container, which was located in the building with an address of 1925 Kishwaukee Street (1925 Building) (see photographs 3 and 4 of the attached inspection report). RBG therefore violated the above-referenced generator requirement.



2. Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil." See, 35 IAC § 739.122(c)(1) [40 C.F.R. § 279.22(c)(1)]. At the time of the inspection, a container for collection of used oil located in the 1925 Building was not labeled with the words "Used Oil" (see photograph 5 of the attached inspection report). RBG therefore violated the above-referenced used oil generator requirement.
3. In order to avoid the need for a hazardous waste storage permit, a large quantity generator using satellite accumulation containers to store hazardous waste must mark the containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers. See, 35 IAC § 722.134(c)(1)(B) [40 CFR § 262.34(c)(1)(ii)]. At the time of the inspection, two 55-gallon containers for the accumulation of hazardous waste oily skimmings located adjacent to two sulfuric acid process tanks were not labeled with the words, "Hazardous Waste" or other words to describe their contents. These containers were located in the building addressed 2007 Kishwaukee Street (2007 Building). Therefore, RBG failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption.
4. In order to avoid the need for a hazardous waste storage permit, a large quantity generator using satellite accumulation containers to store hazardous waste must always keep the containers closed except when it is necessary to add or remove waste. See, 35 IAC §§ 722.134(c)(1)(A) and 725.273(a) [40 CFR §§ 262.34(c)(1)(i) and 265.173(a)]. This is also a requirement of owners and operators of hazardous waste storage facilities that use containers to store hazardous waste under 35 IAC § 724.273(a) [40 C.F.R. § 264.173(a)]. At the time of the inspection, two 55-gallon containers for the accumulation of hazardous waste oily skimmings located adjacent to two sulfuric acid process tanks in the 2007 Building were open at a time when waste was not being added to nor removed from the containers. RBG therefore failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption, and violated the storage facility container requirement.
5. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must have a contingency plan for the facility that includes, among other items, the names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator. See, 35 IAC §§ 722.134(a)(4) and 725.152(d) [40 C.F.R. §§ 262.34(a)(4) and 265.52(d)]. This is also a requirement of owners and operators of hazardous waste storage facilities under 35 IAC 724.152(d) [40 C.F.R. 264.52(d)]. At the time of the inspection, the home address of Mr. Agapito Chavez was not included in RBG's hazardous waste contingency plan, despite Mr. Agapito being listed as an emergency coordinator. RBG therefore failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption, and violated the hazardous waste storage facility contingency planning requirement.

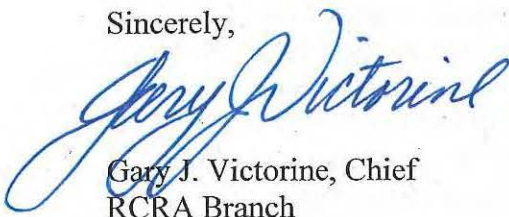


6. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must have a contingency plan for the facility that includes, among other items, a description of the arrangements agreed to by local police department, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to 35 IAC § 725.137 [40 C.F.R. § 265.37]. See, 35 IAC §§ 722.134(a)(4) and 725.152(c) [40 C.F.R. §§ 262.34(a)(4) and 265.52(c)]. This is also a requirement of owners and operators of hazardous waste storage facilities under 35 IAC § 724.152(c) [40 C.F.R. § 264.52(c)]. At the time of the inspection, RBG's contingency plan did not describe the above-mentioned arrangements. RBG therefore failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption, and violated the hazardous waste storage facility contingency planning requirement.
7. A large quantity generator who accumulates hazardous waste on-site and who does not meet the conditions for a hazardous waste storage permit exemption of 35 IAC §§ 722.134(a) and (c) is an operator of a hazardous waste storage facility, and is required to obtain an Illinois hazardous waste storage permit. See, 35 IAC § 703.121(a) [40 C.F.R. § 270.1(c)]. Upon failing to comply with the permit exemption conditions identified in items 3-6, above, RBG's failure to apply for and obtain a hazardous waste storage permit violated the permitting requirements of 35 IAC § 703.121(a) [40 CFR § 270.1(c)]

At this time, EPA is not requiring RBG to apply for and obtain a hazardous waste storage permit so long as it immediately establishes compliance with the conditions for an exemption outlined above. According to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, you are hereby requested to submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

You should submit your response to Todd Brown, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Mr. Brown, of my staff, at (312) 886-6091.

Sincerely,



Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: Todd Marvel, Illinois Environmental Protection Agency ([todd.marvel@illinois.gov](mailto:todd.marvel@illinois.gov))

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 W. JACKSON BOULEVARD  
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

**INSTALLATION NAME:** Rogers Brothers Galvanizing

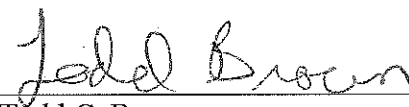
**U.S. EPA ID No.:** ILD005113063

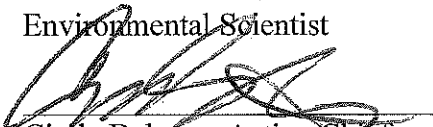
**LOCATION ADDRESS:** 1925 Kishwaukee Street  
Rockford, Illinois 61104

**NAICS CODE:** 33812 Metal Coating, Engraving (Except Jewelry  
and Silverware), and Allied Services to  
Manufacturers

**DATE OF INSPECTION:** May 29, 2013

**U.S. EPA INSPECTOR:** Todd C. Brown

**PREPARED BY:**   
Todd C. Brown  
Environmental Scientist  
Date 7/8/13

**REVIEWED BY:**   
Cindy Dabner, Acting Chief  
Compliance Section 1  
RCRA Branch  
Date 7-17-13



## I. Purpose of Inspection

The purpose of this unannounced compliance evaluation inspection (CEI) was to evaluate the compliance of Rogers Brothers Galvanizing (RBG), located in Rockford, Illinois, with the Resource Conservation and Recovery Act (RCRA), with respect to its management of hazardous waste and used oil.

## II. Site Description

RBG conducts zinc galvanizing on carbon steel. Its facility includes two buildings with addresses of 1925 and 2007 Kishwaukee Street (1925 and 2007 buildings), respectively; and outdoor yard space (Figure 1). The 1925 building is mainly utilized for office space, product/raw material storage, and maintenance activities. The galvanizing equipment is located at the 2007 building.



Figure 1: Aerial view of Rogers Brothers Galvanizing, Rockford, Illinois. The red line denotes approximate facility boundaries.

Galvanizing proceeds in a series of tanks as follows. In-coming parts are cleaned by immersion in tanks of sodium hydroxide and/or 10% sulfuric acid, each of which is followed by a water rinse. Parts are subsequently immersed in a series of tanks containing zinc ammonium chloride flux (to prevent oxidation), molten zinc (850 °F), and quench water. Cyanides are reportedly not used in the process. Over the last five years, RBG has reportedly reduced the amount of lead in its process through changes in raw material specification.

Over time, the sulfuric acid used in the cleaning phase becomes contaminated with zinc and iron. To increase its useful lifetime, it is processed in an on-site acid purification unit which “chills”





the acid, and removes the metals through centrifugation. It is reportedly a closed-loop system. A solid, zinc ferrous sulfate stream is generated by the purification unit, which is stored in bags, and shipped off-site for use in the manufacture of fertilizer and animal feed.

RBG is a large quantity generator of hazardous waste. Hazardous wastes generated by RBG include:

- 1) Spent sulfuric acid which can no longer be purified;
- 2) Oily skimmings taken from the top of the sulfuric acid process tanks;
- 3) Solids from periodic cleanout of the sodium hydroxide and flux tanks; and
- 4) Solvent from a parts washer serviced by Safety Kleen.

Used oil is generated by the forklift shop. Spent fluorescent lamps are shipped off-site to Safety Kleen.

RBG reported the following hazardous waste streams in its 2011 Annual Hazardous Waste Report.

- 28,000 gallons of spent acid possessing the characteristics of corrosivity and cadmium/lead toxicity;
- 7,260 gallons of spent acid possessing the characteristics of corrosivity and chromium/lead toxicity; and
- 1,127 gallons of aqueous waste, without cyanides, possessing the characteristics of corrosivity and chromium/lead toxicity.

Reportedly non-hazardous waste streams shipped off-site for recycling include bottom dross that accumulates over time in the molten zinc tanks; and oxidized zinc skimmed from the top of the molten zinc tanks (zinc skimmings).

RBG has approximately 95 employees, operating over two production and one maintenance shift.

### **III. Opening Conference**

I arrived at RBG on May 29, 2013, at approximately 9:45 A.M. Upon arrival, I presented my credentials to, and conducted an opening conference with, Mr. Tom Ferolie, Operations Manager. Mr. Greg Kazmerski, Environmental Protection Specialist, Illinois Environmental Protection Agency (IEPA), was also in attendance.

During the conference, I explained the purpose of the inspection, and interviewed Mr. Ferolie on RBG's operations and waste management activities. Information provided in response to my inquiry is summarized in Section II of this report. I provided Mr. Ferolie with EPA's Small Business Handout, a list of pollution prevention contacts in Region 5, and a pamphlet from the Illinois Sustainable Technology Center. I informed Mr. Ferolie that all information collected





during the inspection could be made available to the public upon request; unless RBG made a confidential business information claim, which could later be supported.

#### **IV. Site Tour**

At approximately 10:17 A.M., Messrs. Ferolie, Kazmerski, and I proceeded on a tour of the facility, including both buildings and the outdoor yard space. The following is a summary of my observations as noted during the tour.

Eight bags of zinc iron sulfate generated by the acid purification system were located in the 1925 building (photographs 1 and 2). The containers were marked with dates ranging between May 21 and 29, 2013.

One container of an unknown material was present in the 1925 building, adjacent to a container of "hydrated lime" (photographs 3 and 4). The container was open and in poor condition (i.e., rusted and dented). Its contents appeared solid.

One large tote container for the collection of used oil was present in the 1925 building. The container was not visibly labeled as "used oil" (photograph 5).

Fourteen containers of solids removed from a quench water tank (photograph 6) were located in close proximity to a more numerous collection of containers of zinc skimmings (photograph 7). Both materials are reportedly sent off-site for recycling.

Two trailer cars are located on the outdoor portions of RBG's property. One of the trailers contained solid masses of bottom dross removed from the molten zinc tanks (photograph 8). The other contained 55-gallon drums of a material referred to by RBG as "black sal," though labeled "black salt" (photograph 9). Mr. Ferolie explained the generation of this material as follows. Zinc ammonium chloride is added to the top of the molten zinc tanks to aid with keeping parts clean and preventing oxidation. The material eventually needs to be skimmed from the top of the tanks, and is referred to as "black sal." It is reportedly sent off-site for recycling.

Two 55-gallon containers for accumulation of hazardous oily skimmings, generated from two separate sulfuric acid process tanks, were located in the 2007 building (photographs 10 and 11). Both contained some amount of material, were open, and unlabeled.

There are four tanks in the 2007 building which feed sulfuric acid from the process lines to the acid purification system (photographs 12 and 13). A larger tank holding quench water is also located in this area. The acid purification system operates daily on a batch basis. Tanks reportedly begin filling on Monday, and will be empty by Friday. It is a reportedly closed loop system. The area appeared to be provided with secondary containment.



## **V. Records Review**

At approximately 11:08 A.M., I conducted a review of records. These included: hazardous waste manifests; land disposal restriction notifications; zinc iron sulfate analytical and shipping records; annual hazardous waste reports; contingency plan; RCRA training documents; and a list of facilities who receive zinc-bearing secondary materials from RBG for recycling.

### ***Hazardous Waste Manifests***

Manifests were on-site dating back at least three years. Land disposal restriction notifications were included in the files. The records indicate two waste streams have been manifested off-site thus far in 2013: oily skimmings from the sulfuric acid tanks, and spent sulfuric acid.

The oily skimmings have been sent off-site five times during 2013. The material is described on the manifests as: "waste corrosive liquid sulfuric acid, lead;" and by the hazardous waste numbers: D002, D007 and D008. The records indicate shipments of 55 gallons once or twice per month. All were destined to the Safety Kleen facility in Dolton, Illinois (EPA ID number: ILD980613913).

Two shipments of "spent waste sulfuric acid" by tanker car occurred on May 24, 2013. The volume of each shipment was approximately 3,400 and 3,500 gallons, respectively. The hazardous waste numbers D002, D006 and D008 were included on the manifests. Both shipments were destined to Vickery Environmental in Ohio (OHD020273819).

### ***Zinc Iron Sulfate Records***

I reviewed and obtained copies of: (1) a fertilizer certification of analysis corresponding to a sample of RBG's zinc iron sulfate stream; and (2) two example shipping records for recent shipments of zinc iron sulfate to two of the receiving facilities (Attachment C).

The fertilizer certification of analysis provides analytical results for a sample described as "zinc sulphate heptahydrate" [sic] collected in August 2000. Zinc concentration is reported at 14.75%. "Total" concentrations for the Toxicity Characteristic Leaching Procedure (TCLP) metals were included in the analysis.

Bills-of-lading are maintained for the off-site shipments of zinc iron sulfate dating back at least as far as 2010. The material was shipped to the following two facilities in 2013:

- Agrium U.S., Inc. Micronutrient Division  
2405 W. Vasser Road  
Reese, Michigan 48757



- Add Iron Corporation  
730 Miley Road  
North Lima, Ohio 44452

During the record review, I discussed with Mr. Ferolie and Mr. Michael R. McKinnon, President of RBG, the conditions of the solid waste exclusion at 40 C.F.R. § 261.4(a)(20) for zinc-bearing secondary materials used to manufacture fertilizer. In response to my inquiry, I was provided with the following information.

- Zinc iron sulfate is stored on-site for approximately two weeks before shipment.
- RBG does not receive confirmation of receipt from the receiving facilities.
- RBG has not notified the IEPA that it is claiming the exclusion at 40 C.F.R. § 261.4(a)(20) for its zinc iron sulfate stream.
- RBG does not send notifications to the receiving facilities that the zinc iron sulfate is subject to the conditions of the exclusion at 40 C.F.R. § 261.4(a)(20).

I explained to Messrs. Ferolie and McKinnon that the conditions for exclusion at 40 C.F.R. § 261.4(a)(20) would only be applicable if the zinc iron sulfate met the definition of a hazardous waste, which I could not determine at the time of the inspection.

### ***Contingency Plan***

While reviewing RBG's contingency plan, I noted the following.

- 1) The emergency coordinators are listed as Mr. Ferolie and Mr. Agapito Chaves. Mr. Chaves' home address is not included in the plan.
- 2) The plan does not describe arrangements made with local authorities and emergency responders (e.g., fire department, police, hospital, etc.).

### ***RCRA Training Documents***

RBG maintains records of the training it provides to employees for compliance with RCRA hazardous waste regulations. Documents reviewed included: sign-in sheets listing the name of the employees who have completed the training and their respective job titles; and a description of the material covered during the training.

### ***Off-site Shipments of Zinc Secondary Materials for Recycling***

I obtained a copy of a spread sheet which lists the customers to which RBG sends its bottom dross, zinc skimmings, and black sal (identified as spent flux) (Attachment D).

I inquired of Messrs. Ferolie and McKinnon as to the manner in which these materials are recycled. In response, it was explained that the dross and skimmings undergo metals reclamation,





after which the remaining material is used in fertilizer production. At the time of the inspection, they were not sure as to the use of the black sal, but stated they would inquire, and provide me with the information.

## **VI. Closing Conference**

After the record review, I conducted a closing conference with Messrs. Ferolie and McKinnon. At that time, I discussed the zinc-fertilizer exemption conditions at 40 C.F.R. § 261.4(a)(20); as well as potential deficiencies observed during the inspection, which included: satellite container labeling and closing, and contingency plan content.

I departed RBG at approximately 12:30 P.M.

## **Attachments**

A: Inspection Photographs

B: RCRA Generator Inspection Checklist (Part 722)

C: Zinc Iron Sulfate Records

D: Spreadsheet of Customers Receiving Secondary Materials from RBG



**Attachment A: Photographs for Rogers Brothers Galvanizing (ILD005113063). Rockford, Illinois.**

**Photo Number** 1  
**Photo Filename** DSCN0558.jpg  
**Date/Time** 5/29/2013  
10:23:46 AM  
**Photographer** Todd C. Brown

**Description**

Containers of zinc iron sulfate. The material is generated by an on-site recycling process that removes accumulated iron and zinc from sulfuric acid so it can be recycled back to the galvanizing process. Location: 1925 Building.



**Photo Number** 2  
**Photo Filename** DSCN0559.jpg  
**Date/Time** 5/29/2013  
10:24:02 AM  
**Photographer** Todd C. Brown

**Description**

Close-up of one of the containers of zinc iron sulfate featured in photograph 1.







**Attachment A: Photographs for Rogers Brothers Galvanizing (ILD005113063). Rockford, Illinois.**

**Photo Number** 3

**Photo Filename** DSCN0560.jpg

**Date/Time** 5/29/2013  
10:29:02 AM

**Photographer** Todd C. Brown

**Description**

Open, un-labeled 55-gallon container  
(middle container) of unknown material.  
Location: 1925 Building.



**Photo Number** 4

**Photo Filename** DSCN0561.jpg

**Date/Time** 5/29/2013  
10:29:12 AM

**Photographer** Todd C. Brown

**Description**

Top view of the container featured in  
photograph 4.







**Attachment A: Photographs for Rogers Brothers Galvanizing (ILD005113063). Rockford, Illinois.**

**Photo Number** 5  
**Photo Filename** DSCN0562.jpg  
**Date/Time** 5/29/2013  
10:32:18 AM  
**Photographer** Todd C. Brown

**Description**

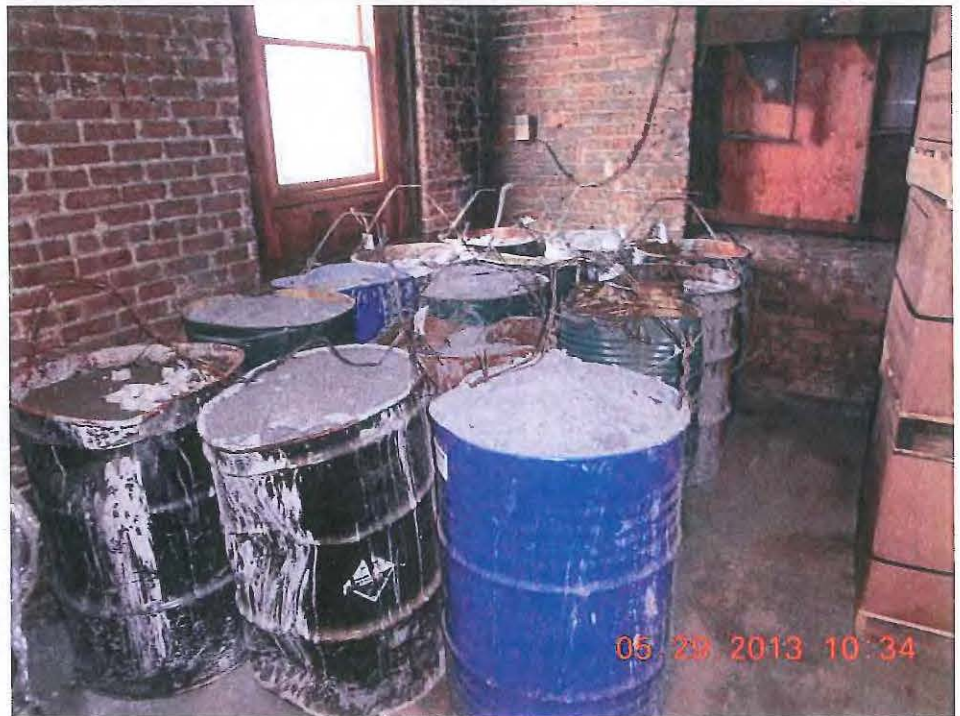
Container for the storage of used oil. The container was not labeled. Location: 1925 Building.



**Photo Number** 6  
**Photo Filename** DSCN0563.jpg  
**Date/Time** 5/29/2013  
10:34:56 AM  
**Photographer** Todd C. Brown

**Description**

Fourteen containers of zinc-bearing solids removed from the quench tank. Location: 1925 Building.







**Attachment A: Photographs for Rogers Brothers Galvanizing (ILD005113063). Rockford, Illinois.**

**Photo Number** 7

**Photo Filename** DSCN0564.jpg

**Date/Time** 5/29/2013  
10:36:18 AM

**Photographer** Todd C. Brown

**Description**

Containers of zinc-bearing solids skimmed  
from the surface of the molten zinc tanks.  
Location: 1925 Building.



**Photo Number** 8

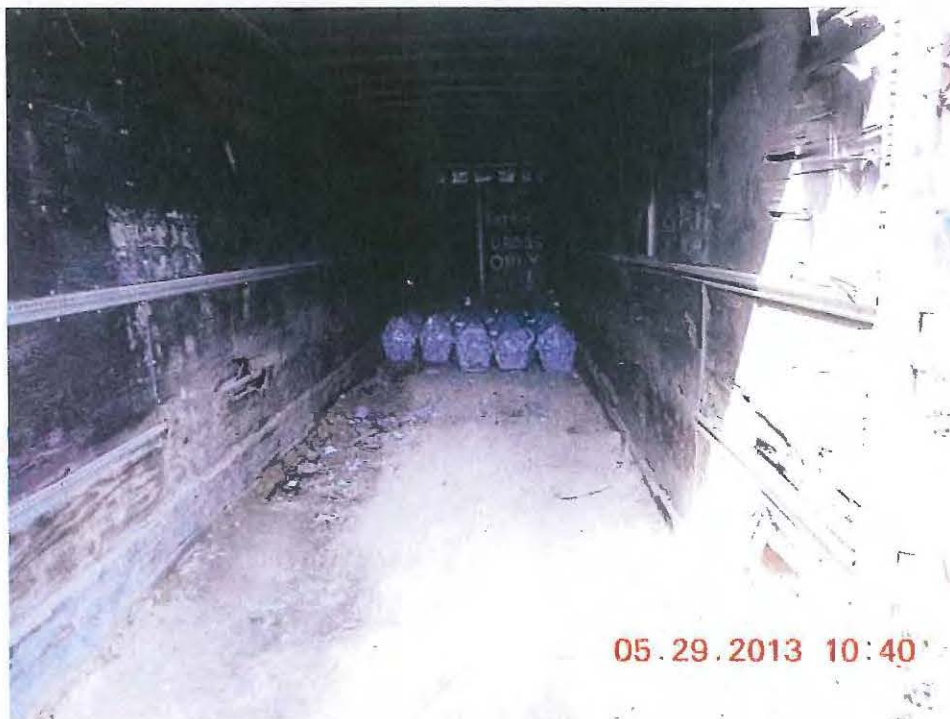
**Photo Filename** DSCN0565.jpg

**Date/Time** 5/29/2013  
10:40:04 AM

**Photographer** Todd C. Brown

**Description**

Bottom slag from the molten zinc tanks.  
Location: Trailer outside.







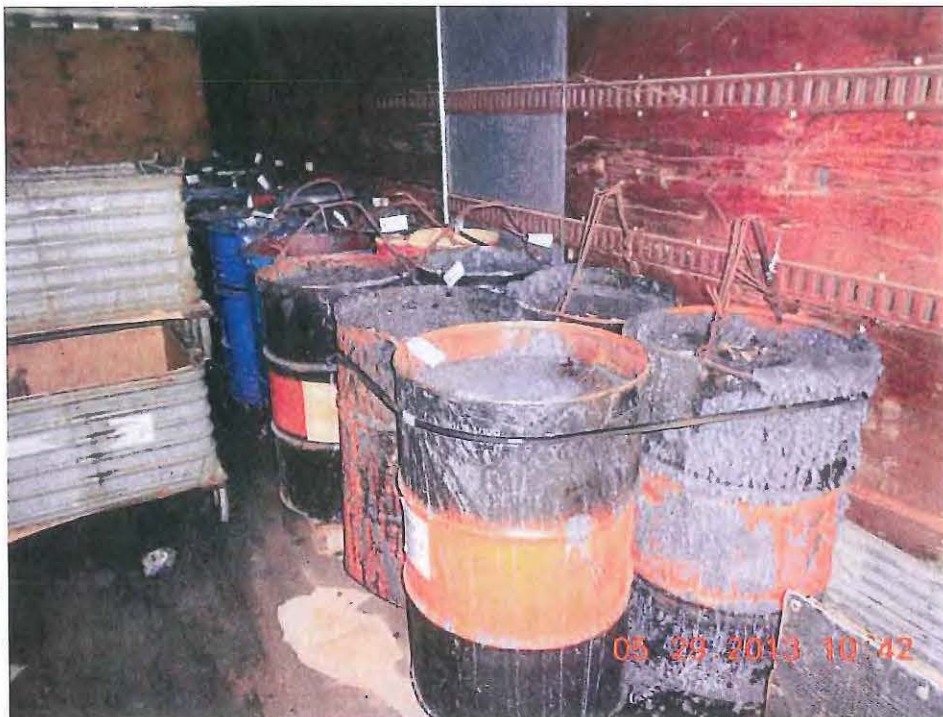
**Attachment A: Photographs for Rogers Brothers Galvanizing (ILD005113063). Rockford, Illinois.**

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*Photo Number* 9  
*Photo Filename* DSCN0566.jpg  
*Date/Time* 5/29/2013  
10:42:04 AM  
*Photographer* Todd C. Brown

**Description**

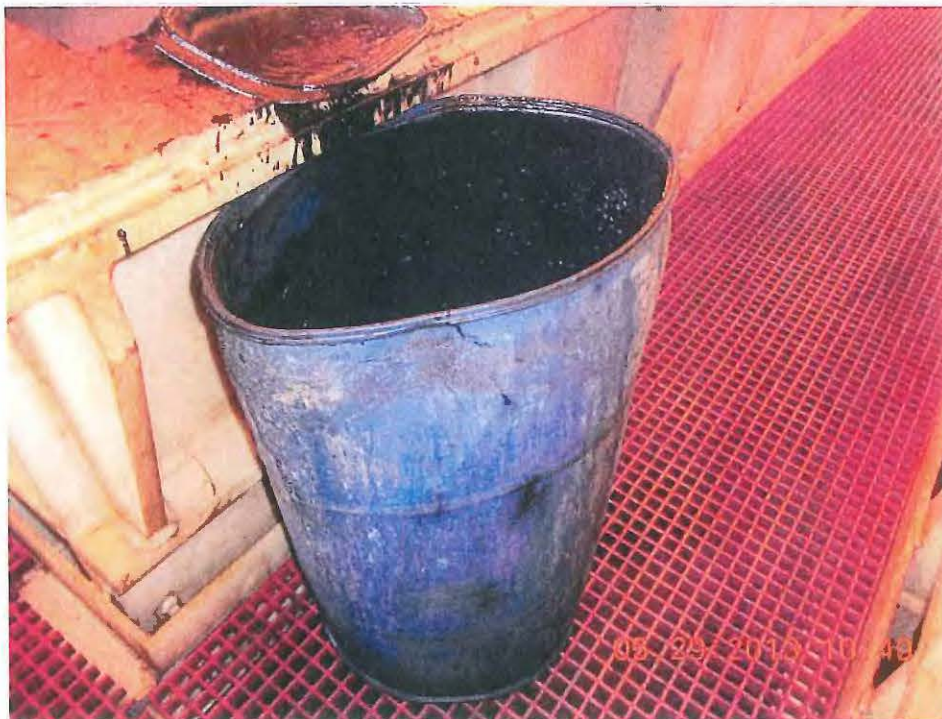
Containers of "black sal." Location: Trailer outside.



*Photo Number* 10  
*Photo Filename* DSCN0567.jpg  
*Date/Time* 5/29/2013  
10:49:24 AM  
*Photographer* Todd C. Brown

**Description**

55-gallon container for accumulation of oily skimmings from a 10% sulfuric acid process tank. The container was open and unlabeled. Location: 2007 Building.







**Attachment A: Photographs for Rogers Brothers Galvanizing (ILD005113063). Rockford, Illinois.**

**Photo Number** 11

**Photo Filename** DSCN0568.jpg

**Date/Time** 5/29/2013  
10:49:58 AM

**Photographer** Todd C. Brown

**Description**

Second 55-gallon container for the accumulation of oily skimmings from a 10% sulfuric acid process tank. The container was open and unlabeled. Location: 2007 Building.



**Photo Number** 12

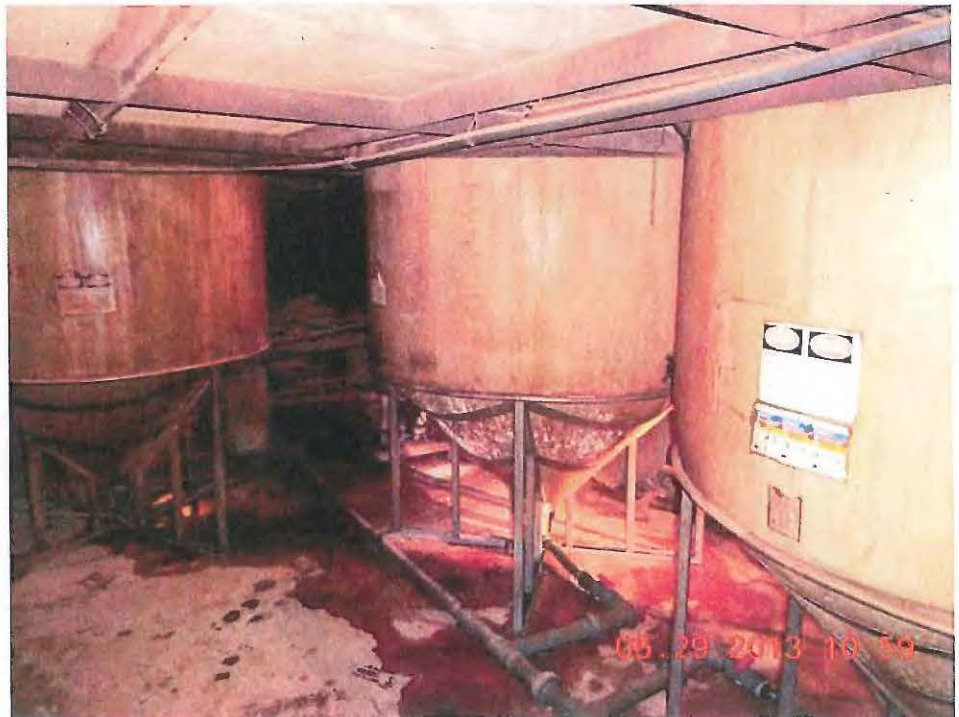
**Photo Filename** DSCN0569.jpg

**Date/Time** 5/29/2013  
10:59:02 AM

**Photographer** Todd C. Brown

**Description**

Tanks associated with the sulfuric acid recycling system. Location: 2007 Building.





**Attachment A: Photographs for Rogers Brothers Galvanizing (ILD005113063). Rockford, Illinois.**

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*Photo Number* 13

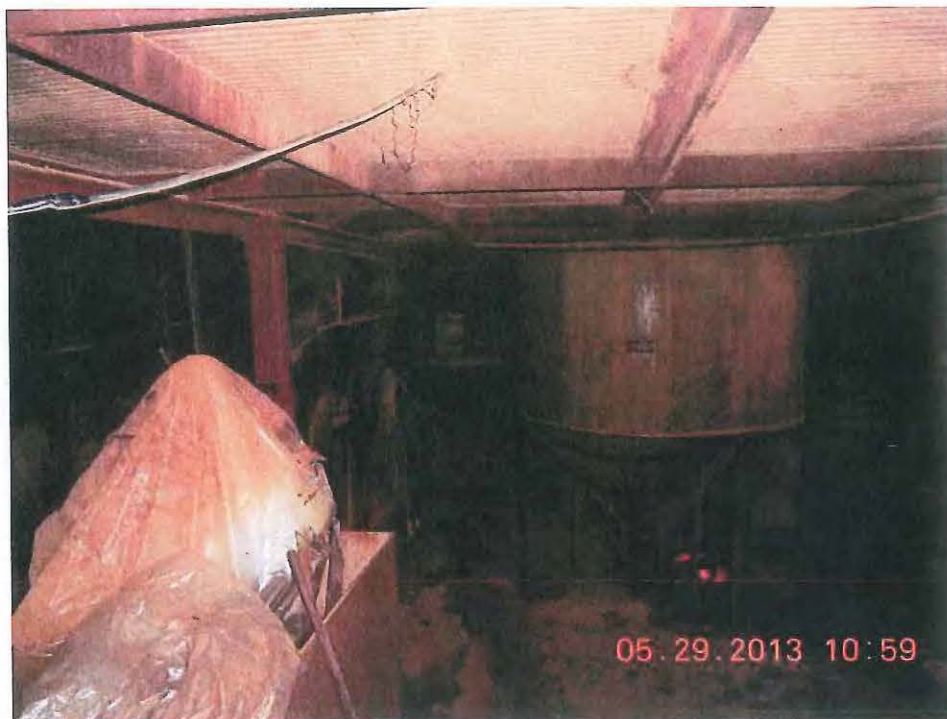
*Photo Filename* DSCN0570.jpg

*Date/Time* 5/29/2013  
10:59:12 AM

*Photographer* Todd C. Brown

*Description*

Tanks associated with the sulfuric acid recycling system. Location: 2007 Building.





## **Attachment B**

### **RCRA Generator Inspection Checklist (Part 722)**





Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	<b>PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (&gt;1000 KG/MO.)</b>	
	<b>SUBPART A: GENERAL</b>	
722.111	<b>Section 722.111 Hazardous Waste Determination</b> Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? <i>see report</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? <i>see report</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <i>NI</i>	808.121(a)
722.112(a)	<b>Section 722.112 USEPA Identification Numbers</b> Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? <i>for identified HAZ wastes</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	<b>SUBPART B: THE MANIFEST</b>	
722.120(a)	<b>Section 722.120 General Requirements</b> Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <i>NI</i>	722.120(b)
722.121(a)	<b>Section 722.121 Acquisition of Manifests</b> Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(d)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(a)
	- an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(b)
722.122	<b>Section 722.122 Number of Copies</b> Does the manifest consist of at least 6 copies? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122
722.123(a)	<b>Section 722.123 Use of the Manifest</b> For each manifest reviewed, has the generator: - signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(a)
	- retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <i>NI</i>	
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(b)
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <i>NI</i>	722.123(c)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	<b>SUBPART C: PRE-TRANSPORT REQUIREMENTS</b>	
722.130	Is there any hazardous waste ready for transport off-site? Yes _____ No <u>✓</u> N/A _____	722.130
	If so, is the generator complying with the pre-transport requirements in Subpart C? Yes _____ No _____ N/A <u>✓</u>	
	<b>Section 722.134 Accumulation Time</b>	
(722.134(a))	Has the generator complied with the following requirements: Yes _____ No _____ N/A _____	
(722.134(a)(1))	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC? <u>open Containers</u> Yes _____ No <u>✓</u> N/A _____	
	and/or	
	B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? Yes _____ No _____ N/A <u>✓</u>	
	and/or	
	C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes _____ No _____ N/A <u>✓</u>	
	and/or	
	D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes _____ No _____ N/A <u>✓</u>	
(722.134(a)(2))	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? <u>none in storage other than satellite</u> Yes _____ No _____ N/A <u>NI</u>	
(722.134(a)(3))	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? <u>No per satellite</u> Yes _____ No <u>✓</u> N/A _____	
(722.134(a)(4))	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? <u>Contingency plan deficient</u> Yes _____ No <u>✓</u> N/A _____	
	Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:	
	Does the facility accumulate hazardous waste in containers? Yes <u>✓</u> No _____ N/A _____	
	If "No", go to Subpart J.	
	<b>SUBPART I: USE AND MANAGEMENT OF CONTAINERS</b>	
(725.211)	Has the generator closed an accumulation area? Yes _____ No _____ N/A <u>✓</u>	725.211
(725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes _____ No _____ N/A <u>✓</u>	725.214
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes _____ No _____ N/A <u>✓</u>	
(725.272)	Is the waste compatible with the container and/or liner? Yes <u>✓</u> No _____ N/A _____	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes _____ No <u>✓</u> N/A _____	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <u>✓</u> No _____ N/A _____	



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.274)	<p>Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration?  Yes <u>      </u> No <u>      </u> N/A <u>      </u></p> <p>Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131)  Yes <u>      </u> No <u>      </u> N/A <u>      </u></p>	
(725.276)	<p>Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?  Yes <u>      </u> No <u>      </u> N/A <u>      </u></p> <p><b>Note:</b> See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.</p>	
(725.277)	<p>Is the owner/operator complying with the requirements concerning incompatible wastes?  Yes <u>      </u> No <u>      </u> N/A <u>      </u></p> <p>COMMENTS:</p>	
(725.278)	<p><b>Section 725.278 Air Emission Standards</b></p> <p>Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725?  Yes <u>      </u> No <u>      </u> N/A <u>      </u></p> <p>Comments:</p> <p>Does the generator accumulate and/or treat hazardous waste in tanks?  Yes <u>      </u> No <u>      </u> N/A <u>      </u></p> <p><b>Note:</b> If "No", go to Subpart C.</p>	
	<p><b>SUBPART J: TANK SYSTEMS</b></p> <p>Has the generator closed an accumulation area?  Yes <u>      </u> No <u>      </u> N/A <u>      </u></p> <p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214?  Yes <u>      </u> No <u>      </u> N/A <u>      </u></p>	725.211
(725.211) (725.214)		725.214
(725.290)	<p>Does the facility accumulate or treat hazardous waste in tanks?  Yes <u>      </u> No <u>      </u> N/A <u>      </u></p> <p><b>Note:</b> A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.</p> <p>If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.</p> <p>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).</p> <p>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	

AB

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.291(a))	For tanks <b>existing</b> prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(e)]? Yes _____ No _____ N/A _____	
(725.291(b))	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the wastes? Yes _____ No _____ N/A _____ 3) existing corrosion protection measures? Yes _____ No _____ N/A _____ 4) documented age of the tank system? Yes _____ No _____ N/A _____ 5) results of a leak test, internal inspection, or other tank integrity examination? Yes _____ No _____ N/A _____  *IRPE = Independent Registered Professional Engineer	
(725.291(c))	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes _____ No _____ N/A _____  <b>Note:</b> If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	
(725.292(a))	For <b>new</b> tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes _____ No _____ N/A _____ Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the waste(s) to be handled? Yes _____ No _____ N/A _____ 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes _____ No _____ N/A _____ 4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes _____ No _____ N/A _____ 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes _____ No _____ N/A _____	
(725.292(g))	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____ N/A _____	

JB

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(a))	<p>Is secondary containment provided for any new tank system before being put into service?  Yes _____ No _____ N/A _____</p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89?  Yes _____ No _____ N/A _____</p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later?  Yes _____ No _____ N/A _____</p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95?  Yes _____ No _____ N/A _____</p> <p>or  if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later?  Yes _____ No _____ N/A _____</p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87?  Yes _____ No _____ N/A _____</p>	
(725.293(b))	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time?  Yes _____ No _____ N/A _____</p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed?  Yes _____ No _____ N/A _____</p>	
(725.293(c))	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <ol style="list-style-type: none"> <li>compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure?  Yes _____ No _____ N/A _____</li> <li>placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression of uplift?  Yes _____ No _____ N/A _____</li> <li>provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours?  Yes _____ No _____ N/A _____</li> <li>sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation?  Yes _____ No _____ N/A _____</li> </ol> <p>and  is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	
(725.293(d))	<p>Does the secondary containment for tanks have one or more of the following:</p> <ol style="list-style-type: none"> <li>a liner (external to the tank); or</li> <li>a vault; or</li> <li>a double-walled tank; or</li> <li>an equivalent device (approved by the Board)?</li> </ol> <p>Yes _____ No _____ N/A _____</p>	
(725.293(e))	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)?  Yes _____ No _____ N/A _____</p>	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(f))	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)?</p> <p>Yes _____ No _____ N/A _____</p> <p>If "No":</p> <p>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) Are welded flanges, joints and connections inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.293(i))	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)?</p> <p>Yes _____ No _____ N/A _____</p> <p><b>Note:</b> If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	
(725.294(a))	<p>Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.294(b))	<p>Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including:</p> <p>1) spill prevention controls?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) overfill prevention controls?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) sufficient freeboard in uncovered tanks?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.294(c))	<p><b>Note:</b> If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.</p>	
(725.295(a))	<p>Does the owner/operator inspect, if present, at least each operating day, the following:</p> <p>1) overfill/spill control equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) the aboveground portion of the tank system for corrosion or releases?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) data from monitoring equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) the construction materials and the area immediately surrounding the external portion of the system?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295(b))	<p>If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295(c))	<p>Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)?</p> <p>Yes _____ No _____ N/A _____</p>	



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296)	<p>If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator:</p> <p>a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release?  Yes _____ No _____ N/A _____</p> <p>b) removed applicable waste from the system within 24 hours of detection?  Yes _____ No _____ N/A _____</p> <p>c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water?  Yes _____ No _____ N/A _____</p>	
(725.296(d))	<p>d) notified the Agency within 24 hours of detection of release?  Yes _____ No _____ N/A _____</p> <p>d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.</p>	
(725.296(e))	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system?  Yes _____ No _____ N/A _____</p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment?  Yes _____ No _____ N/A _____</p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair?  Yes _____ No _____ N/A _____</p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection?  Yes _____ No _____ N/A _____</p>	
(725.296(f))	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297(a))	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]?  Yes _____ No _____ N/A _____</p>	
(725.297(a))	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?  Yes _____ No _____ N/A _____</p>	
(725.297(b))	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.298(a))	<p>Are ignitable or reactive wastes placed in a tank system?  Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:  - the resulting waste, mixture or dissolved material is no longer ignitable or reactive?  Yes _____ No _____ N/A _____</p> <p>- Section 725.117(b) is complied with?  Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction?  Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the tank used solely for emergencies?  Yes _____ No _____ N/A _____</p>	
(725.298(b))	<p>Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line?  Yes _____ No _____ N/A _____</p>	
(725.299)	<p>Are incompatible wastes/materials placed in the same tank?  Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.300.</p> <p>Is Section 725.117(b) being complied with?  Yes _____ No _____ N/A _____</p> <p>Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with?  Yes _____ No _____ N/A _____</p> <p>COMMENTS:</p>	
(725.302)	<p><b>Section 725.302 Air Emission Standards</b></p> <p>Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725?  Yes _____ No _____ N/A _____</p> <p>Comments:</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.131)	<b>SUBPART C: PREPAREDNESS AND PREVENTION</b> Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) a telephone or other device to summon emergency assistance from local authorities? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d) water at adequate volume and pressure for fire control? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.135)	Is the facility maintaining adequate aisle space? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - agreements designating the primary authority where more than one police or fire department might respond? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - agreements with State emergency response teams, contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	<b>SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES</b>	
(725.151(a))	Is the contingency plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.151(b))	Has there been a fire, explosion or release of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the contingency plan been carried out immediately? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.152(a))	Does the plan describe the actions required for response to: - fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.152(c))	<p>Does the plan describe arrangements with:</p> <ul style="list-style-type: none"> <li>- police and fire departments? Yes _____ No <u>1</u> N/A _____</li> <li>- hospitals? Yes _____ No _____ N/A _____</li> <li>- contractors? Yes _____ No _____ N/A _____</li> <li>- emergency response teams? Yes _____ No _____ N/A _____</li> </ul>	
(725.152(d))	<p>Does the plan contain the current emergency coordinator's name, phone (office and home) and address? <i>Not for backup</i> <i>i.e. address</i></p> <p>Yes _____ No <u>✓</u> N/A _____</p>	
(725.152(e))	<p>Does the plan identify all emergency equipment including:</p> <ul style="list-style-type: none"> <li>- description? Yes <u>1</u> No _____ N/A _____</li> <li>- capability? Yes _____ No _____ N/A _____</li> <li>- location? Yes _____ No _____ N/A _____</li> </ul> <p>Is the list of emergency equipment up-to-date?</p> <p>Yes _____ No _____ N/A <u>NT</u></p>	
(725.152(f))	<p>Does the plan include:</p> <ul style="list-style-type: none"> <li>- an evacuation plan? Yes <u>✓</u> No _____ N/A _____</li> <li>- an evacuation signal? Yes <u>✓</u> No _____ N/A _____</li> <li>- alternate evacuation routes? Yes <u>✓</u> No _____ N/A _____</li> </ul>	
(725.153)	<p>Has the contingency plan (including all revisions) been:</p> <p>a) maintained at the facility? Yes <u>✓</u> No _____ N/A _____</p> <p>b) submitted to:</p> <ul style="list-style-type: none"> <li>- police department? Yes <u>✓</u> No _____ N/A _____</li> <li>- fire department? Yes <u>✓</u> No _____ N/A _____</li> <li>- hospital? Yes <u>✓</u> No _____ N/A _____</li> <li>- emergency response teams? Yes _____ No _____ N/A _____</li> </ul>	
(725.154)	<p>Has the contingency plan been reviewed and revised whenever:</p> <p>a) regulations are revised? Yes _____ No _____ N/A _____</p> <p>b) the plan fails in an emergency? Yes _____ No _____ N/A _____</p> <p>c) the facility changes in a way that modifies the emergency response necessary? Yes _____ No _____ N/A _____</p> <p>d) information regarding emergency coordinators changes? Yes _____ No _____ N/A _____</p> <p>e) information regarding equipment changes? Yes _____ No _____ N/A _____</p>	
(725.155)	<p>Is the emergency coordinator on-site or on call at all times? Yes <u>✓</u> No _____ N/A _____</p> <p>Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes <u>✓</u> No _____ N/A _____</p> <p>Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes <u>✓</u> No _____ N/A _____</p>	
(725.156)	<p>If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes _____ No _____ N/A <u>NT</u></p> <p><b>Note:</b> If the facility has had a release, explain in detail.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	<p><b>Section 725.116 Personnel Training</b></p> <p>Does the facility have a training program? Yes <u>          </u> No <u>          </u> N/A <u>          </u></p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes <u>          </u> No <u>          </u> N/A <u>          </u></p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes <u>          </u> No <u>          </u> N/A <u>          </u></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes <u>          </u> No <u>          </u> N/A <u>          </u></p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> <li>- procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes <u>          </u> No <u>          </u> N/A <u>          </u></li> <li>- procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <u>          </u> No <u>          </u> N/A <u>          </u></li> <li>- key parameters for automatic waste feed cut-off systems? Yes <u>          </u> No <u>          </u> N/A <u>          </u></li> <li>- communications or alarm systems? Yes <u>          </u> No <u>          </u> N/A <u>          </u></li> <li>- response to fire or explosions? Yes <u>          </u> No <u>          </u> N/A <u>          </u></li> <li>- response to groundwater contamination incidents? Yes <u>          </u> No <u>          </u> N/A <u>          </u></li> <li>- shutdown of operations? Yes <u>          </u> No <u>          </u> N/A <u>          </u></li> </ul>	
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <u>          </u> No <u>          </u> N/A <u>          </u> <u>157</u></p>	
(725.116(c))	<p>Have facility personnel received an annual review of the initial training? Yes <u>          </u> No <u>          </u> N/A <u>          </u></p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> <li>1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes <u>          </u> No <u>          </u> N/A <u>          </u></li> <li>2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <u>          </u> No <u>          </u> N/A <u>          </u></li> <li>3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes <u>          </u> No <u>          </u> N/A <u>          </u></li> <li>4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes <u>          </u> No <u>          </u> N/A <u>          </u></li> </ol>	
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes <u>          </u> No <u>          </u> N/A <u>          </u></p>	



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	<p><b>Section 728.107 Waste Analysis and Recordkeeping</b></p> <p>Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Is the plan on-site?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Does the plan include a detailed physical and chemical analysis?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity?  Yes _____ No _____ N/A _____</p> <p>Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
722.134(c)	<p><b>Section 722.134 Satellite Accumulation</b></p> <p>Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents?  Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste complied with the requirements of Section 722.134(a) within 3 working days?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>If there are more than 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
722.134(g)	<p><b>Note:</b> A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.</p>	
	<b>SUBPART D: RECORDKEEPING AND REPORTING</b>	
722.140(a)	<p><b>Section 722.140 Recordkeeping</b></p> <p>Has the generator retained for a period of 3 years:  - a copy of each signed manifest?  Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	722.140(a)
722.140(b)	<p>Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)?  Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	722.140(b)
722.140(c)	<p>Has the generator retained for a period of 3 years:  - copies of test results, waste analyses or other determinations made in accordance with Section 722.111?  Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	722.140(c)
722.140(d)	<p>Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	722.140(d)
722.141(a)	<p><b>Section 722.141 Annual Reporting</b></p> <p>Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year?  Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p><b>Note:</b> If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.</p>	722.141(a)

JB

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	<b>Section 722.142 Exception Reporting</b>	722.141(b)
722.142(a)(1)	If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.142(a)(2)
722.143	<b>Section 722.143 Additional Reporting</b> Has the generator furnished additional reports as required by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.143
	<b>SUBPART E: EXPORTS OF HAZARDOUS WASTE</b>	
722.150	Is the generator an exporter of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart E? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.150
	<b>SUBPART F: IMPORTS OF HAZARDOUS WASTE</b>	
722.160	Is the generator an importer of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart F? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.160
	<b>SUBPART G: FARMERS</b>	
722.170	Is the generator a farmer? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart G? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.170
	COMMENTS:	

*JB*



## **Attachment C**

### **Zinc Iron Sulfate Records**





**FERTILIZER  
CERTIFICATE OF ANALYSIS**

LAB SAMPLE: BB4625

DATE RECEIVED: 8/14/00

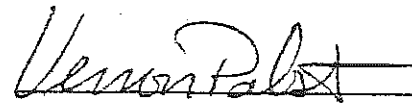
DATE REPORTED: 8/21/00

SAMPLE DESCRIPTION: Zinc Sulphate Heptahydrate

SAMPLE IDENTIFICATION: #1 Rockford, IL Plant

METHOD	ANALYSIS	RESULTS
	Total Zinc	14.75 %
	Total Sulfur	10.98 %
	Total Arsenic	< 5.0 mg/Kg      mg/kg = ppm
	Total Barium	8.8 mg/Kg
	Total Cadmium	5.8 mg/Kg
	Total Chromium	21.2 mg/Kg
	Total Cobalt	16.9 mg/Kg
	Total Lead	26.3 mg/Kg
	Total Mercury	< 5.0 mg/Kg
	Total Molybdenum	< 5.0 mg/Kg
	Total Nickel	224 mg/Kg
	Total Selenium	< 5.0 mg/Kg
	Total Silver	< 5.0 mg/Kg

Approved by:



1-800-321-1562  
(740) 335-1562  
Fax: (740) 335-1104  
E-Mail: [info@spectrumanalytic.com](mailto:info@spectrumanalytic.com)

P.O. BOX 639 1087 JAMISON ROAD  
WASHINGTON C.H., OHIO 43160

SOIL ANALYSIS  
PLANT ANALYSIS  
FERTILIZER ANALYSIS  
MANURE ANALYSIS



## 010000

Shipper No. \_\_\_\_\_

Carrier No. \_\_\_\_\_

Date 3-21-13

New:  
Greenview Chemical

Landstar

(Name of Carrier)

[SCAC]

TO: 6/ Aaron US TUC Michael Michael

FROM: Shipper **ROGERS BROTHERS INC**

On Collect on Delivery shipments, the letters "COD" must appear before consignee's name - or as other Street 2405 W Jackson Rd CM-157

Street **1925 KISHWAUKEE STREET**

Destination Reese ME Zip Code 48757

Origin **ROCKFORD IL**

Zip Code **61104**

Vehicle Number ONE-H 900-292-3672

U.S. DOT Hazmat  
Reg. Number

Route

No. Shipping Units	* HM	Kind of Packaging, Description of Articles, Special Marks and Exceptions	Weight (Subject to Correction)	RATE	CHARGES
15	X	NA3077, Other regulated Substances, Solid N.O.S., Zinc Iron Sulfate, 9, PG III	43.826		
		Zinc Iron Sulfate, Moist No # G478 ERG # 171 - copy provided			
		* Third Party Bill *			
		To: Greenview Chemical Sales 4345 N Lincoln Ave Chicago IL 60618			

\* Third Party Bill \*

TO: Greenview Chemical Sales  
4345 N Lincoln Ave  
Chicago, IL 60618

REMIT

GOD TO:

ADDRESS

COD

Amt: \$

COD	FFF
-----	-----

PREPAID ☐

COLLECT ☐

Note — Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:

The carrier shall not receive delivery of this shipment without payment of freight and all other charges.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \_\_\_\_\_

TOTAL CHARGES:	\$
----------------	----

CHARGES:	
FREIGHT CHARGES	

FREIGHT PREPAID

except when  
box at right  
is checked

Check box  
if change was

to be

RECEIVED, subject to the classifications and lawfully filed tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, numbered, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said port, on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

Shirley hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SHIPPER **ROGERS BROTHERS INC.**

CARRIER *LANDSTAR*

PER *Tom Fendri*

PER *[Signature]*

EMERGENCY RESPONSE  
TELEPHONE NUMBER: 800-451-8346

DATE 3-21-03

Monitored at all times the Hazardous Material is in transportation including storage incidental to transportation (5172.604)

BL-601-3

BL-601-3

PRINTED IN U.S.A.



**STRAIGHT BILL OF LADING**  
ORIGINAL - NOT NEGOTIABLE

Shipper No. \_\_\_\_\_

Carrier No. \_\_\_\_\_

Date **3-14-13**

**Big Green Express**

(Name of Carrier)

(SCAC)

TO: <b>Add Iron Corporation</b>		FROM: <b>ROGERS BROTHERS INC.</b>	
On Collect on Delivery shipments, the letters "COD" must appear before consignee's name -- or as otherwise provided in Item 430, Sec. 1			
Street <b>730 Miley Rd</b>	Street <b>1925 KISHWAUKEE STREET</b>		
Destination <b>North Lima, OH</b>	Zip Code <b>44452</b>	Origin <b>ROCKFORD, IL</b>	Zip Code <b>61104</b>
Vehicle Number _____		U.S. DOT Hazmat Reg. Number _____	

No. Shipping Units	* HM	Kind of Packaging, Description of Articles, Special Marks and Exceptions	Weight (Subject to Correction)	RATE	CHARGES
<b>15</b>	<b>X</b>	<b>R.Q. Other regulated substances, Solid,</b>	<b>42.810</b>		
<b>Bags.</b>		<b>Nos. 9, NA3077, PG III</b>			
		<b>(Zinc Iron Sulfate)</b>			
		<b>Zinc Iron Sulfate, Moist</b>			
		<b>Load # 2383</b>			
		<b>ER6 # 171-copy provided w/MSDS</b>			

REMIT C.O.D. TO: ADDRESS	<b>COD</b> Amt: \$	C.O.D. FEE: PREPAID <input type="checkbox"/> COLLECT <input type="checkbox"/> \$
Note - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.	Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.	TOTAL CHARGES: \$
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$ _____ per _____	<i>Thur Feroles</i> (Signature of Consignor)	FREIGHT CHARGES: FREIGHT PREPAID <input type="checkbox"/> except when box at right is checked. Check box if charges are to be collected. <input checked="" type="checkbox"/>

RECEIVED, subject to the classifications and lawfully filed tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said station, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in any of said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SHIPPER <b>ROGERS BROTHERS INC.</b>	CARRIER <b>T B G E</b>
PER <i>Thur Feroles</i>	PER <b>Ron Wallis</b>
EMERGENCY RESPONSE TELEPHONE NUMBER: <b>800-457-8346</b>	DATE <b>3-14-13</b>

Monitored at all times the Hazardous Material is in transportation including storage incidental to transportation (§172.604)

BL-601-3  
PRINTED IN U.S.A.

\* Mark with an "X" to designate Hazardous Material as defined in the Department of Transportation Regulations governing the transportation of hazardous materials. The use of this column is an optional method for identifying hazardous materials on bills of lading per Section 172.201(a)(1)(B) of Title 49, code of Federal Regulations. Also, when shipping hazardous materials, the shipper's certification statement prescribed in Section 172.204(a) of the Federal Regulations must be indicated on the bill of lading, unless a specific exception from this requirement is provided in the Regulations for a particular material.





## **Attachment D**

### **Spreadsheet of Customers Receiving Secondary Materials from RBG**



Customers		Shipping Address			
Address		Shipping Address			
Corporation	2012	Add Iron Corporation			
Reservoir Cir. Ste 100		730 Miley Road			
MD 21208		North Lima, OH 44452			
Materials	2012	EA Raw Materials		EA Raw Materials %Acme Transp.	
18		11 Henry Henning Drive		15840 West Avenue	
NY 12543		Maybrook, NY 12543		Harvey, IL	
Chemical Sales	2012	Agrium US Inc.			
18 Ravenswood Unit 222		2405 Vasser Road			
IL 60613		Reese, MI 48757			
Motorantim Metals	2012	US Zinc			
18000 Blvd.		6020 Esperson St.			
TX 77001		Houston, TX 77001			
Metals Inc.	2012	Whiting Metal			
18000 Blvd.		2230 Indianapolis Dr.			
CA 90064		Whiting, IN 46384			
Metals Co., Inc.	2012	% Acme Transportation			
18000 Blvd.		5950 W. 66th Street			
PA 15317		Bedford Park, IL 60638			
SB Enterprises	2012	SB Enterprises % CMA CGM Line		SB % YM Green	
18000 Blvd.		7000 W. 71st Street		2664 Baseline Rd V090W	
MA 01810		Bedford Park, IL 60638		Elwood, IL	
				SB Enterprises % MSC Line	
				2101 W. 59th St.	
				Chicago, IL 60638	
				SB Enterprises	
				5 Endicott Rd.	
				Andover, MA 01810	





# LAND AND CHEMICALS DIVISION

Type of Document: Information Request

Name of Document: Rogers Brothers Inc (ILD005113063)

	<u>NAMES</u>	<u>DATE</u>
AUTHOR:	<u>Jedd Brown</u>	<u>12/12/13</u>
SECTION APA:	<u>R. Andege RPA</u>	<u>12/17/13</u>
SECTION CHIEF:	<u>[Signature]</u>	<u>12/17/13</u>
BRANCH APA:	<u>_____</u>	<u>_____</u>
BRANCH CHIEF:	<u>_____</u>	<u>_____</u>
DIVISION APA:	<u>_____</u>	<u>_____</u>
DIVISION DIRECTOR:	<u>_____</u>	<u>_____</u>
OTHERS:	<u>[Signature]</u>	<u>12/12/13</u>
DRA:	<u>_____</u>	<u>_____</u>
RA:	<u>_____</u>	<u>_____</u>
RETURN TO:	<u>_____</u>	<u>_____</u>
PHONE:	<u>_____</u>	<u>_____</u>

COMMENTS:

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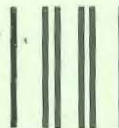
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UNITED STATES POSTAL SERVICE



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

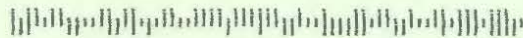
• Sender: Please print your name, address, and ZIP+4 in this box •

Todd Brown  
U.S EPA / R5 - LR-8J  
77 W. Jackson Blvd  
Chicago, IL 60604

**RECEIVED**  
DIVISION FRONT OFFICE

DEC 20 2013

LAND AND CHEMICALS DIVISION  
U.S. EPA - REGION 5



**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Michael R. McKinnon / President  
Rogers Brothers Galvanizing  
1925 Kishwaukee Street  
Rockford, Illinois 31104

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

Denise Lisiecki

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☐ No

Mail ☐ Express Mail

ed ☐ Return Receipt for Merchandise

Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number

(Transfer from service label)

7009 1680 0000 7663 7091

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

DEC 17 2019

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL**

**RETURN RECEIPT REQUESTED 7009 1680 0000 7663 7091**

Mr. Michael R. McKinnon  
President  
Rogers Brothers Galvanizing  
1925 Kishwaukee Street  
Rockford, Illinois 61104

Re: Request for Information  
EPA ID No.: ILD005113063

Dear Mr. McKinnon:

By this letter, the U.S. Environmental Protection Agency requests information under Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of EPA to require you to submit certain information.

This request requires Rogers Brothers Galvanizing (RBG) to submit certain information relating to the management of zinc-bearing secondary materials at RBG's facility located at 1925 Kishwaukee Street in Rockford, Illinois. We are requiring this information to determine RBG's compliance status with the Standards Applicable to Generators of Hazardous Waste set forth at Title 35 of the Illinois Administrative Code (IAC) Part 722; and Title 40 of the Code of Federal Regulations (CFR) Part 262. The enclosure specifies the information you must submit. You must submit this information within thirty (30) calendar days of receiving this request to the United States Environmental Protection Agency, Attention: Todd Brown, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

RBG may, under 40 CFR Part 2 Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 CFR § 2.203(b). We will disclose the information covered by a business confidentiality claim only to the extent and by means of the procedures at 40 CFR Part 2 Subpart B. RBG must make any request for confidentiality when it submits the information since any information not so identified may be made available to the public without further notice.

RBG must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should notify us.





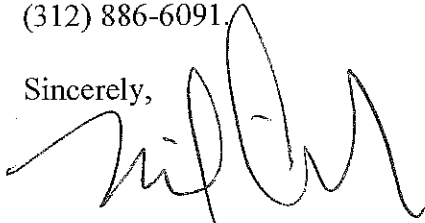
Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341. We may use the requested information in an administrative, civil or criminal action.

This request is not subject to the Paperwork Reduction Act, U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject RBG to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

You should direct questions about this request for information to Mr. Brown, of my staff, at (312) 886-6091.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Cunningham", written over the word "Sincerely,".

Michael Cunningham  
Chief  
Compliance Section 1

Enclosure

cc: Todd Marvel ([todd.marvel@illinois.gov](mailto:todd.marvel@illinois.gov)), Illinois Environmental Protection Agency  
(w/ enclosure)



## REQUEST FOR INFORMATION

**Instructions:** You must respond separately to each of the questions or requests in this attachment. Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.

### Requests

1. Identify all persons consulted in preparing the answers to this Request for Information. Provide the full name and title for each person identified.

During an EPA inspection at Rogers Brothers Galvanizing (RBG) on May 29, 2013, it was found that RBG generates several zinc-bearing secondary materials from its galvanizing processes, including: bottom dross (from molten zinc tanks), zinc skimmings (from molten zinc tanks), solids removed from a quench water tank, and spent flux (or "black sal"). According to RBG, the above-mentioned secondary materials are sent off-site for recycling, including for use in the manufacture of fertilizer. With respect to these materials, please provide the following information.

2. Provide the name and address of the facilities to which RBG has sent each of the above-mentioned secondary materials for recycling, during the three year period immediately preceding your receipt of this Request for Information. In your answer, be specific to which facility receives which material.
3. For each of the materials, describe how they are recycled by the off-site receiving facility. In your answer, describe the actual products (or intermediates) that are produced from the recycled materials, and the actual recycling process.
4. For each of the above-mentioned secondary materials, state whether RBG is claiming the exclusion from identification as a solid waste (and therefore hazardous waste), at 35 IAC § 721.104(a)(20) [40 C.F.R. § 261.4(a)(20)], for hazardous secondary materials used to make zinc fertilizers (herein referred to as the "zinc fertilizer exclusion"). In your answer, be specific as to for which materials RBG is claiming the exemption.
5. If RBG is claiming the zinc fertilizer exclusion for any of the above-mentioned materials, state whether RBG has submitted, to either the U.S. EPA or Illinois Environmental Protection Agency (IEPA), a one-time notice that contains RBG's name, address, and USEPA identification number; provides a brief description of the secondary material that will be subject to the exclusion; and which identifies when RBG intended to begin managing excluded zinc-bearing hazardous secondary materials under the conditions of the exclusion.
6. If the answer to 5, above, is affirmative, provide a true and accurate copy of the notice(s).



7. If RBG is claiming the zinc fertilizer exclusion for any of the above-mentioned materials, state whether, with each off-site shipment of excluded hazardous secondary material, RBG provides written notice to the receiving facility stating that the material is subject to the conditions of 35 IAC § 721.104 (a)(20) [40 C.F.R. § 261.4(a)(20)].
8. If the answer to 7, above, is affirmative, provide a true and accurate copy of the last such notification to each of the receiving facilities.
9. State whether RBG maintains, for no less than three years, records of all off-site shipments of its bottom dross, zinc skimmings, quench water tank solids, and spent flux (black sal) which include the following information:
  - (a) Name of the transporter and date of the shipment;
  - (b) Name and address of the facility that received the material, and documentation confirming receipt of the shipment; and
  - (c) Type and quantity of material in each shipment.
10. If the answer to 9, above, is affirmative, provide true and accurate copies of these records for one year period immediately preceding your receipt of this request for information.
11. State whether RBG has determined if its bottom dross, zinc skimmings, quench water tank solids, and spent flux (black sal) possess the characteristic of toxicity, and is therefore a hazardous waste, as described at 35 IAC § 721.124 [40 C.F.R. § 261.24].
12. If the answer to 11, above, is affirmative, provide true and accurate copies of the records that document the results of those determinations (e.g., analytical reports).
13. If the answer to 11, above, is affirmative, and the Toxicity Characteristic Leaching Procedure (TCLP) was not used in making the determinations; but instead, RBG made the determinations through application of its knowledge of the hazard characteristic of the secondary materials in light of the materials or processes used, provide a detailed explanation of the basis for that knowledge.
14. Provide the following certification by a responsible corporate officer:

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.





MAY 18 1981  
CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

SEWHME

Raymond McKinnon  
Rogers Brothers Inc.  
2007 Kishwaukee Street  
Rockford, Illinois 61108

RE: NOV Rogers Brothers Inc, Rockford, Illinois  
ILD0005113063

Dear Mr. McKinnon:

Notice is hereby given that the United States Environmental Protection Agency (U.S. EPA) has determined that the above facility is in violation of a requirement of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended by the Quiet Communities Act of 1978. Specifically it has been determined that Rogers Brothers Inc., is in violation of Section 3004 of RCRA (42 USC 6924).

On February 20, 1981, a representative of the Illinois Environmental Protection Agency (IEPA) inspected your facility at 2007 Kishwaukee Street, Rockford Illinois. The report is forwarded for your information. The purpose of this inspection was to determine your facility's compliance status with RCRA. The inspector found that you did not have a written schedule for inspecting all monitoring equipment, safety, and emergency equipment, security devices and operating and structural equipment. This is a violation of 40 CFR 266.13(b)(1). Your facility did not maintain an inspection log for recording inspections required by 40 CFR 266.13(b)(1). This is a violation of 40 CFR 266.13(b)(b).

You are hereby requested to provide documentation to this office, within 15 days after receipt of this Notice of Violation, informing us of action taken to correct these violations. Please address such documentation to U.S. Environmental Protection Agency, Enforcement Division, Attention: Water & Hazardous Materials Compliance Section, 230 South Dearborn, Chicago, Illinois 60604. If you have any questions, please contact Ralph Feeney at (312) 353-2114.

Very truly yours,

Kenneth A. Fenner, Chief  
Water & Hazardous Materials  
Enforcement Branch

Enclosure

cc: John S. Moore, Director  
Land/Noise Pollution Control Division  
Illinois Environmental Protection Agency

bcc: ~~Constantelos/Klepitsch~~  
Stone  
Baumgartner/Lewis  
Feeney  
Pamela D. LoPinto (IEPA)

2  
bcc: ~~Constantelos/Klepitsch~~  
Stone  
Baumgartner/Lewis  
Feeney  
Pamela D. LoPinto (IEPA)

1. The first of these is the  
fact that the number of  
cases of the disease has  
increased in the last few  
years.

OBSERVATION REPORT - SITE INVENTORY NO. (11) 2 4 2 2 2 (18)

Region # 2

Date 02/24/21  
(20) (25)

(Location)

1. FLEET SERVICES INC.  
(Responsible Party)

Letter Sent (Yes or No)   N    
(26)

Samples Taken: Yes ( ) No (✓)

Time: From 07:10 P m

Weather 50° Windy. Cloudy

Ground Water( ) Surface( ) Other( )

To 03:45 am

Photos Taken: Yes ( ) No ( )

Interviewed Chas. H. [unclear]

Inspector 2 D L  
(27) (29)

Previous Inspection 2/16/81

Previous Correspondence *none*

Site Open: Yes ( ☒ ) No ( ☐ )

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating ( )

Landfill ( )      Storage

E.P.A. Permit ( )

Temporarily Closed ( )

Random Dump ( ) Salvage

Variance  $\sigma^2$  ( )

Closed Not Covered ( )

Other ( ) 1944 A.C.D.

21(e) ( )

Closed and Covered ( )

Quantity Received Daily(1-6)

Board Order ( )

IMPROVED

RECEIVED

(30)

Illegal (5) ( ) (31)

SAME

MAR 13 1981

LPC 4 1/79 5,000

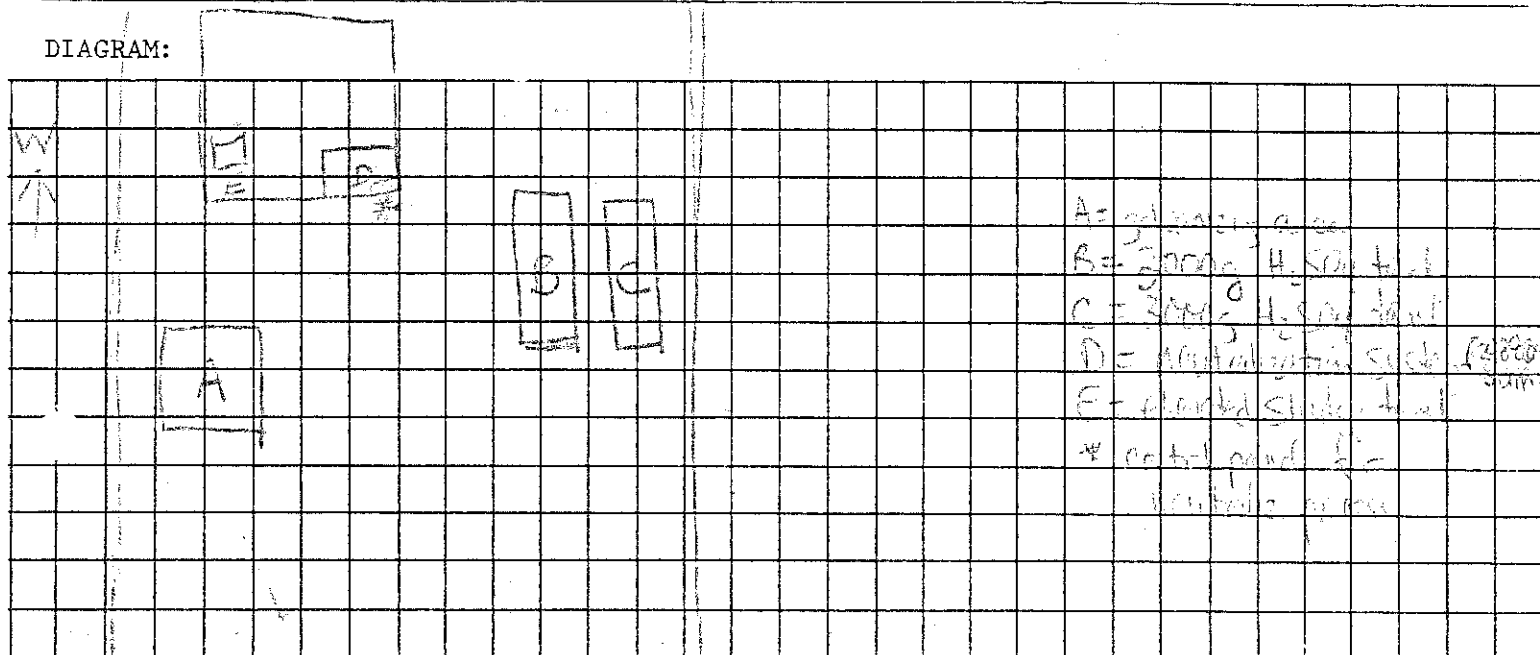
DETERIORATED

I S or D      S  
(62)

GENERAL REMARKS: I met with my permission to conduct a USEPA 155 inspection.  
 The bottom is a relatively small galvanic zone. A small galvanic zone of treated  
 bottom and are produced in the. The treated and in accordance with the  
 11. The results of the work is not defined, however, due to the excessive damage by  
 the bottom of the zone of the bottom point remains in the centerline. Tests B and C are  
 in the same state for steel and zinc lining galvanizing sacks. No. 4 is added to the  
 surface of the bottom. The steel is treated in the bottom of the zone and is exposed to the  
 bottom of the bottom. The bottom is the product of the bottom and is the bottom of the bottom.

INTERVIEW: with PUC She has "4" and put back: When Supplemental Paved to  
S-01639 and S-02216 have been given to PUC. As to the Surface Area and Horizontal  
Surface Area although only S-01639 has been used since Jan. 5 1959. The 2000 gallon  
tanks for holding sludge were used in the S-01639 and S-02216 tanks. These tanks were  
checked in the sketch on the application and 3 and are not necessarily being used.

DIAGRAM:



1111

1111



ENVIRONMENTAL PROTECTION AGENCY STATE OF ILLINOIS

L P C F C O 5 5 C

(1) (8) (9)

OBSERVATION REPORT - SITE INVENTORY NO. 20103030

(11) (18)

CO. - L.P.C.

Region # 2

Date 4/19/81

(20) (25)

Letter Sent (Yes or No) N

(26)

(Location)

(Responsible Party)

Samples Taken: Yes ( ) No (X)

Time: From 02:10 P m

Ground Water( ) Surface( ) Other( )

To 02:20 P m

Photos Taken: Yes ( ) No (X)

Interviewed SCIAMM

Inspector P D L (27) (29)

Previous Inspection NONE

Previous Correspondence NONE

Site Open: Yes (X) No ( )

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating (X)

Landfill ( )

Storage ( ) E.P.A. Permit (X)

Temporarily Closed ( )

Random Dump ( )

Salvage ( ) Variance ( )

Closed Not Covered ( )

Other (X)

A.C.D. ( ) 21(e) ( )

Closed and Covered ( )

Quantity Received Daily(1-6) 1

(30)

Board Order ( )

Illegal (5) ( )

(31)

IMPROVED

SAME

MAR 13 1981

LPC 4 1/79 5,000

DETERIORATED

E.P.A. - D.L.P.C.

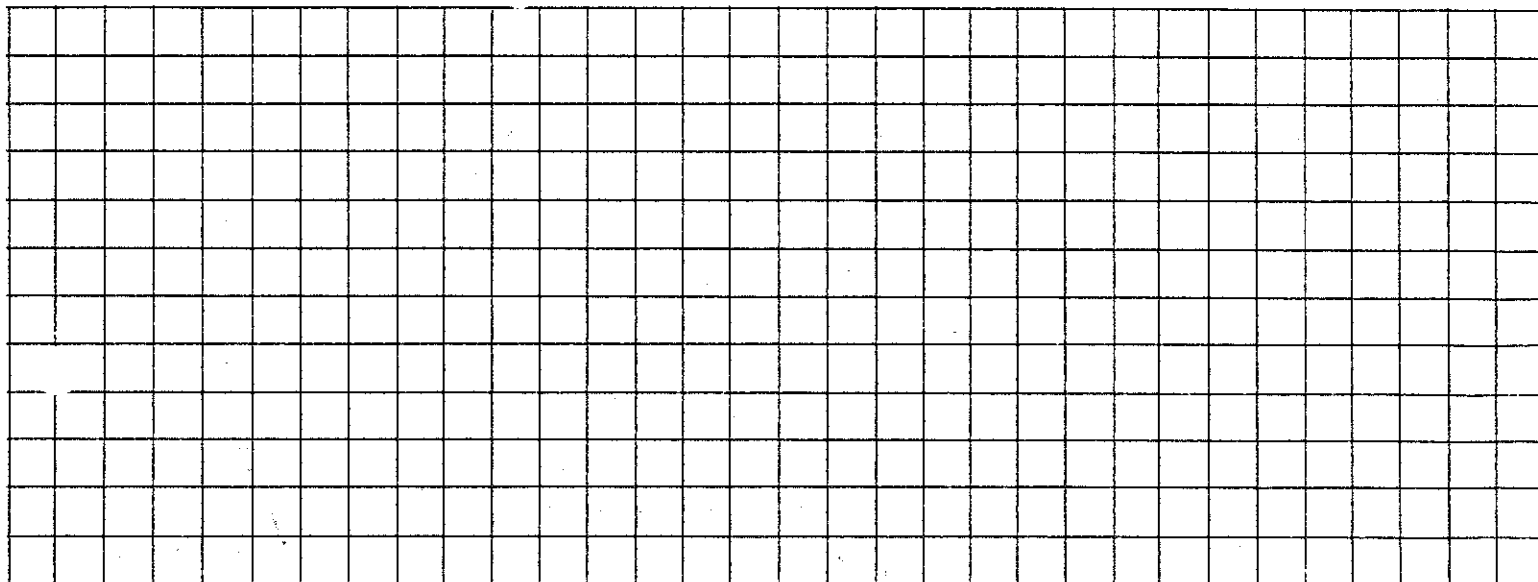
I S or D S (62)

STATE OF ILLINOIS

GENERAL REMARKS: I arrived at the site and introduced myself & explained my intentions. To someone's surprise, Ray McNamee is the plant supervisor. He said that he had called and could contact the U.S.S. inspectors with me. I left a list of the way work we would need to proceed with me when we do meet.

INTERVIEW:

DIAGRAM:



3

1.  $\text{H}_2\text{O}$  is a polar molecule.

RECEIVED

MAR 18 1991

E.P.A. - D.L.P.C.  
STATE OF ILLINOIS

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS  
TREATMENT, STORAGE, AND DISPOSAL FACILITIES  
Form 1 - General Facility Standards

I. General Information:

(A) Facility Name: Rogers Brothers Inc.  
(B) Street: 2007 Kishwaukee St.  
(C) City: Rockford (D) State: IL (E) Zip Code: 61106  
(F) Phone: 815 965 5132 (G) County: Winnebago  
(H) Operator: Rogers Brothers Inc.  
(I) Street: 2007 Kishwaukee St.  
(J) City: Rockford (K) State: IL (L) Zip Code: 61106  
(M) Phone: 815 965 5132 (N) County: Winnebago  
(O) Owner: Rogers Brothers Inc.  
(P) Street: 2007 Kishwaukee St.  
(Q) City: Rockford (R) State: IL (S) Zip Code: 61106  
(T) Phone: 815 965 5132 (U) County: Winnebago  
(V) Type of Ownership: State Federal County Municipal Private  
(W) Date of Inspection: 2/20/81 (Q) Time of Inspection (From) 2:00 p (To) 3:00  
(X) Weather Conditions: 55°F DAMP SOIL SUNNY

(Y) Person(s) Interviewed	Title	Telephone
<u>Ray McKinnon</u>	<u>Plant Superintendent</u>	<u>8159655132</u>
<hr/>		
(Z) Inspection Participants	Title	Telephone
<u>Ray McKinnon</u>	<u>Plant Superintendent</u>	<u>8159655132</u>
<hr/>		

## II. Description of Site Activity

- |  |   |
|--|---|
| (A) <input checked="" type="checkbox"/> Generator (Form 2)                                   | (B) <input type="checkbox"/> Transporter (Form 3)       |
| (C) <input checked="" type="checkbox"/> Chemical, Physical and Biological Treatment (Form 4) | (D) <input type="checkbox"/> Storage (Form 5)           |
| (E) <input type="checkbox"/> Landfill (Form 6)   | (F) <input type="checkbox"/> Incineration (Form 7)      |
| (G) <input type="checkbox"/> Land Treatment (Form 4)   | (H) <input type="checkbox"/> Thermal Treatment (Form 7) |

(I) Comments: Elementary neutralization unit exemption

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

	Yes	No	Not Inspected	See Remark Number
(J) Has this facility Submitted a Part A Permit Application?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### III. GENERAL FACILITY STANDARDS

	Yes	No	Not Inspected
(A) Has the Regional Administrator been notified regarding:			
1. Receipt of hazardous waste from a foreign source?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2. Transfer of Ownership?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) General Waste Analysis:			
1. Has the owner <sup>or</sup> operator obtained a detailed chemical and physical analysis of the waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Does the owner <sup>or</sup> operator have a detailed waste analysis plan on file at the facility?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(C) Security - Do security measures include:			
1. 24-Hour Surveillance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2. Artificial or Natural Barrier Around Facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Controlled Entry?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Danger Sign(s) at Entrance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) Do Owner <sup>or</sup> Operator Inspections Include:			
1. Records of Malfunctions?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2. Records of Operator Error?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3. Records of Discharges?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
4. Inspection Schedule?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
5. Safety, Emergency Equipment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
6. Security Devices?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
7. Operating and Structural Devices?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
8. Inspection Log?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

	Yes	No	Not Inspected	See Report Number
(E) Do Personnel Training Records Include:				III
1. Job Titles?	_____	<u>✓</u>	<u>✓</u>	_____
2. Description of Training?	_____	<u>✓</u>	<u>✓</u>	_____
3. Records of Training?	_____	<u>✓</u>	<u>✓</u>	_____
Is Personnel Training Completed within the Required Time Frame?	_____	<u>✓</u>	<u>✓</u>	_____

(F) Are the Following Special Requirements for Ignitable, Reactive, or Incompatible Wastes Addressed?

1. Special Handling?	_____	_____	_____	F
2. No Smoking Signs?	_____	_____	_____	_____
3. Separation and Confinement?	_____	_____	_____	_____

#### IV. PREPAREDNESS AND PREVENTION

(A) Maintenance and Operation of Facility:

1. Is there any evidence of fire, Explosion, or release of hazardous waste or hazardous waste constituent?	_____	<u>✓</u>	_____	IV
--	-------	----------	-------	----

(B) Does the Facility have the Following Equipment:

1. Alarm System?	_____	<u>✓</u>	<u>✓</u>	B
2. Telephone or 2-Way Radios?	<u>✓</u>	_____	_____	_____
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	_____	<u>✓</u>	<u>✓</u>	_____

Indicate the volume of water and/or foam available for fire control:

Units: \_\_\_\_\_



	Yes	No	Not Inspected	See Re Number
(C) Testing and Maintenance of Emergency Equipment:				
1. Has the Owner or Operator established Testing and Maintenance Procedures for Emergency Equipment?	_____	✓	✓	CI.
2. Is Emergency Equipment Maintained in Operable Conditions?	_____	✓	✓	CI.
(D) Has Owner <sup>or</sup> Operator Provided Immediate Access to Internal Alarms (if needed)?	_____	✓	✓	D.
(E) Is there Adequate Aisle Space for Unobstructed Movement?	_____	✓		E.
(F) Are Arrangements with Local Authorities Included in the Operating Record?	_____	✓	✓	F.

#### VI. CONTINGENCY PLAN AND EMERGENCY PROCEDURES

(A) Does the Contingency Plan Contain the Following Information:

1. The actions facility personnel must take to comply with §264.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part.)
2. Arrangements agreed to by Local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §264.37?

_____	✓	✓	Δ
_____	✓	✓	I

	Yes	No	Not Inspected	See Rem Number
--	-----	----	---------------	----------------

3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<u>VI</u>
--	--	-------------------------------------	-------------------------------------	-----------

4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<u>VI</u>
--	--	-------------------------------------	-------------------------------------	-----------

5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes:)

		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<u>VI</u>
--	--	-------------------------------------	-------------------------------------	-----------

(B) Are copies of Contingency Plan Available at Site and local Emergency Organizations?

		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<u>VI</u>
--	--	-------------------------------------	-------------------------------------	-----------

(C) Emergency Coordinator

1. Is the facility Emergency Coordinator identified?

		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<u>VI</u>
--	--	-------------------------------------	-------------------------------------	-----------

2. Is Coordinator Familiar with all aspects of site operation and emergency procedures?

		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<u>VI</u>
--	--	-------------------------------------	-------------------------------------	-----------

3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<u>VI</u>
--	--	-------------------------------------	-------------------------------------	-----------

(D) Emergency Procedures

If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency procedures listed in 256.56?

				<u>VI</u>
--	--	--	--	-----------

# VII MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING

	Yes.	No	Not Inspected	See Num
(A) Use of Manifest System				VII
1. Does the facility follow the procedures listed in §265.71 for processing each Manifest?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A
2. Are records of past shipments retained for 3 years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A
(B) Does the owner or operator meet requirements regarding Manifest Discrepancies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
(C) Operating Record				
Does the facility maintain an operating record at the site as required in §265.73?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
(D) Availability, Retention and Disposition of Records				
Are all records available at the site for inspection as required in §265.74?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

## VIII. CLOSURE AND POST CLOSURE

(A) Closure and Post Closure				
1. Closure Plan Available for Inspection by May 19, 1981?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	P
2. Has this plan been submitted to the Regional Administrator?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	P
3. Has Closure begun?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	11
4. Is closure cost estimate available by May 19, 1981?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	11
(B) Post Closure Care and Use of Property				
- Has the Owner or Operator supplied a Post Closure Monitoring Plan (by May 19, 1981)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	11



REMARKS

FORM I. - GENERAL FACILITY STANDARDS

III. General Facility Standards

- A. 1) N/A  
2) N/A
- B. 1) IEPA Supplemental Permit # 802216 Waste Sulfuric Acid  
IEPA Supplemental Permit # 801639 Neutralized Sulfuric Acid  
  
2) N/A The hazardous waste does not change.  
3) N/A
- C. Entry is minimized by building being locked and facility being fenced.
- D. Equipment is checked biweekly. No records are kept of inspections. Operator error does not apply as neutralization process is automatic. Mr. McKinnon stated there can be no discharges. The neutralization area is surrounded by concrete pits and the cleaning tanks, where scale is removed from steel, are steel tanks with PVC 3/16 lining and 4" acid proof brick inside 18" concrete and brick lined pits. There is no safety or emergency equipment.
- E. No personnel training records are kept, there is only one operator.
- F. N/A

IV. Preparedness and Prevention

- B. 1) The neutralization system automatically shuts off if a problem arises.  
  
3) Mr. McKinnon stated that there is no fire hazard
- C. 1) There is no emergency equipment
- D. There are no internal alarms
- E. Mr. McKinnon thinks aisle space is not needed for any of these purposes.
- F. There is neither arrangement with local authorities nor an operating record.

VI. Contingency Plan and Emergency Procedures

There is no contingency plan

- D. N/A

VII. Manifest System, Recordkeeping and Reporting

A. 1) The IEPA manifest is used.

2) Records have been kept since Illinois initiated the manifest system.

B. N/A

VIII. Closure and Post Closure

There are no closure or post closure plans



RECEIVED

MAR 18 1981

E.P.A. — D.L.P.C.  
STATE OF ILLINOIS

1LD005113063  
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS  
Form 2 - Generator Inspection

I. General Information:

(A) Installation Name: Rogers Brothers Inc.

(B) Street: 2007 Kishwaukee St.

(C) City: Rockford (D) State: IL (E) Zip Code: 61101

(F) Phone: 815 965 5132 (G) County: WINNEBAGO

(H) Operator: Rogers Brothers Inc.

(I) Street: 2007 Kishwaukee St.

(J) City: Rockford (K) State: IL (L) Zip Code: 61101

(M) Phone: 815 965 5132 (N) County: WINNEBAGO

(O) Owner: Rogers Brothers Inc.

(P) Street: 2007 Kishwaukee St.

(Q) City: Rockford (R) State: IL (S) Zip Code: 61101

(T) Phone: 815 965 5132 (U) County: WINNEBAGO

(V) Type of Ownership: ☐ Federal ☐ Municipal ☒ Private  
☐ State ☐ County

(W) Date of Inspection: 2/20/81 Time of Inspection (From) 2:10 p (To) 3

(X) Weather Conditions: 55°F DAMP SOIL SUNNY

(Y) Person(s) Interviewed

Title

Telephone

Ray McKinnon

Plant Superintendent

815 96551

(Z) Inspection Participants

Title

Telephone

Ray McKinnon

Plant Superintendent

815 965 51

II. OTHER TYPE OF HAZARDOUS WASTE ACTIVITY

(A)        Transporter (Form 3)

(B)   ✓   Chemical, Physical and  
Biological Treatment (Form 4)

(C)   nt   Storage (Form 5)

(D)        Landfill (Form 6)

(E)        Incineration (Form 7)

(F)        Thermal Treatment (Form 7)

(G) Comments: Elementary neutralization unit exemption

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

### III. MANIFEST

	Yes	Not Inspected	See Rem Number
(A) Are copies of the Manifest available?	<input checked="" type="checkbox"/>		
(B) Does the Manifest contain the following information:			
1. Manifest document number?	<input checked="" type="checkbox"/>		
2. Name, mailing address, telephone number, and EPA ID Number of Generator?	<input checked="" type="checkbox"/>		
3. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>		
4. Name, Address, and EPA ID Number of Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>		
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>		III
6. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>		
7. Required Certification?	<input checked="" type="checkbox"/>		
8. Required Signatures?	<input checked="" type="checkbox"/>		
(C) Does the Owner or Operator Submit Exception Reports when Needed?			III

### IV. PRE-TRANSPORT REQUIREMENTS

(A) Is Generator Packaging waste in accordance with DOT Regulations?	<input checked="" type="checkbox"/>			IV A
(B) Are waste packages marked and labeled in accordance with DOT Regulations concerning hazardous waste materials?	<input checked="" type="checkbox"/>			IV B
(C) If required, are placards available to transporter?		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

Yes No Not Inspected See Remarks

(D) Pre-shipment Accumulation:

1. Are containers marked with start of accumulation date? IV
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days? IV
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line? IV
4. Are wastes stored in tanks managed according to the following:
  - a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank? ✓
  - b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures? IV
  - c. Do continuous feed systems have a waste-feed cutoff? IV
  - d. Are required daily and weekly inspections done? ✓
  - e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements) IV
  - f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply) IV

5. If hazardous waste accumulates on site, does the generator follow the following general facility standards?

A. Do Personnel training records include:

1. Job Titles?
2. Description of Training?
3. Records of Training?

Is Personnel Training Completed within the Required Time Frame?

B. Preparedness and Prevention

1. Maintenance and Operation of Facility:

- a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

2. Does the Facility have the following equipment?

- a. Alarm system?
- b. Telephone or 2-Way Radios?
- c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

Indicate the volume of water and/or foam available for fire control

Units: \_\_\_\_\_

3. Testing and Maintenance of Emergency Equipment:

- a. Has the Owner or Operator established testing and Maintenance Procedures for Emergency Equipment?
- b. Is emergency equipment Maintained in Operable Condition?



Yes No Not Inspected See Rêma Number

4. Has Owner/Operator Provided Immediate Access to Internal Alarms (if needed)?

\_\_\_\_\_ ☒ ☒ \_\_\_\_\_

5. Is there adequate Aisle Space for unobstructed Movement?

\_\_\_\_\_ ☒ ☒ \_\_\_\_\_

6. Are arrangements with local authorities included in the operating record?

\_\_\_\_\_ ☒ ☒ \_\_\_\_\_

(C) Contingency Plan and Emergency Procedure

1. Does the contingency plan contain the following:

a. The actions facility personnel must take to comply with §264.51 and 261.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part)

\_\_\_\_\_ ☒ ☒ \_\_\_\_\_

b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §264.37?

\_\_\_\_\_ ☒ ☒ \_\_\_\_\_

c. Names, addresses, and Phone numbers (office and Home) of all persons qualified to act as emergency coordinator,

\_\_\_\_\_ ☒ ☒ \_\_\_\_\_

d. A list of all emergency equipment at the facility which include the location and physical description of each item on the list, and a brief outline of its capabilities?

\_\_\_\_\_ ☒ ☒ \_\_\_\_\_

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.

\_\_\_\_\_ ☒ ☒ \_\_\_\_\_



	Yes	No	Not Inspected	See Record Number
2. Are copies of the Contingency Plan available at site and local Emergency Organizations?	_____	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	_____
3. Emergency Coordinator				
a. Is the Facility Emergency Coordinator Identified?	_____	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	_____
b. Is Coordinator Familiar with all aspects of site operation and Emergency Procedures?	_____	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	_____
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	_____	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	_____
4. Emergency Procedures				
If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency Procedures listed in §256.56?	_____	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	_____

#### V. RECORDKEEPING

(A) Are Manifests, Annual Reports, Exception Reports, and All Test Results and Analyses Retained for at least three years?

\_\_\_\_\_ ☒ V

#### VI. INTERNATIONAL SHIPMENTS

(A) Has the Installation Imported or Exported Hazardous Waste?

\_\_\_\_\_ ☒ \_\_\_\_\_

(If A was answered Yes, then complete one or both of the following)

1. Exporting Hazardous waste, has a generator:

a. Notified the Administrator in writing?

\_\_\_\_\_

b. Obtained the Signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

\_\_\_\_\_

Yes

N

Not

Inspected

See Remark  
Number

c. Met the Manifest requirements? \_\_\_\_\_

2. Importing Hazardous Waste,  
has the generator:

a. Met the manifest requirements? \_\_\_\_\_

## VII. PREPARER INFORMATION

Name:

Pamela D. LoPinto

Title:

IEPA LSCT

Phone Number:

815 987 7404

REMARKS:

REMARKS

FORM II - GENERATOR INSPECTION

III. Manifest

B. 5) The Illinois waste name is used. DOT requirements are not being met.

C. Never needed thus far

IV. Pre-Transport Requirements

A. N/A Wastes are stored in a steel tank and vacuum pumped in bulk into a tanker truck.

D. N/A

4) b. N/A

V. Recordkeeping

A. Have been retained since Illinois initiated the manifest system.



**D. Corrective  
Action**

NOV 07 1991

5HR-12

Mr. Raymond V. McKinnon  
Vice-President  
Rogers Brothers, Inc.  
2007 Kishwaukee Street  
Rockford, Illinois 61104-5197

RELEASED  
DATE 5/07/01  
RIN #         
INITIALS AK

Re: Rogers Brothers, Inc.  
ILD 005 113 063

Dear Mr. McKinnon:

Per your request of October 24, 1991, enclosed please find a copy of the Preliminary Assessment/Visual Site Inspection for the referenced facility.

The executive summary and conclusions and recommendations sections have been withheld as enforcement confidential.

If you have any questions, please contact me at (312) 886-4448.

Sincerely yours,

ORIGINAL SIGNED BY  
KEVIN M. PIERARD

Kevin M. Pierard, Chief  
Minnesota/Ohio Technical Enforcement Section  
RCRA Enforcement Branch

Enclosure

5HR-12:FHARRIS:11/6/91:6-2884 DISK #2ROGERS.RES

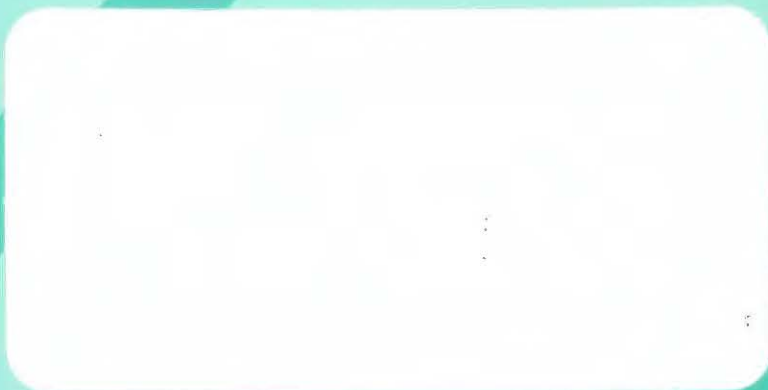
CONCURRENCE REQUESTED FROM REB			
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
	<i>[Signature]</i> 11-6-91	<i>[Signature]</i> 11-6-91	

OFFICIAL FILE COPY





**U.S. Environmental Protection Agency**  
Office of Waste Programs Enforcement  
Contract No. 68-W9-0006



# **TES 9**

**Technical Enforcement Support  
at Hazardous Waste Sites  
Zone III  
Regions 5,6, and 7**



**PRC Environmental Management, Inc.**

PRC Environmental Management, Inc.  
233 North Michigan Avenue  
Suite 1621  
Chicago, IL 60601  
312-856-8700  
Fax 312-938-0118



**PRELIMINARY ASSESSMENT/  
VISUAL SITE INSPECTION**

**ROGERS BROTHERS, INC.  
ROCKFORD, ILLINOIS  
ILD 005 113 063**

**FINAL REPORT**

RELEASED  
DATE 5/07/01  
PIN #         
INITIALS SL

**Prepared for**

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
Office of Waste Programs Enforcement  
Washington, DC 20460**

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	ILD 005 113 063
Date Prepared	:	October 30, 1991
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087
Prepared by	:	PRC Environmental Management, Inc.
Principal Investigator	:	Michael W. Gorman
Telephone No.	:	(312) 332-2230
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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### LIST OF ATTACHMENTS

#### Attachment

- A - EPA PRELIMINARY ASSESSMENT FORM 2070-12
- B - VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
- C - VISUAL SITE INSPECTION FIELD NOTES



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RELEASED  
DATE 5/07/01  
RIN #             
INITIALS           



## EXECUTIVE SUMMARY

Resource Applications, Inc. (RAI), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Rogers Brothers, Inc. (Rogers Bros.) facility in Rockford, Illinois. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

Rogers Bros. produces customized hot dip zinc galvanized steel parts, specifically various types of fasteners. The facility covers four acres, employs 60 people, and has been in operation since 1936. Rogers Bros. generates a spent sulfuric acid and is currently classified as a generator.

The PA/VSI identified the following two SWMU's at the facility:

### Solid Waste Management Units

1. Hazardous Waste Storage Area
2. Oil Storage Drum

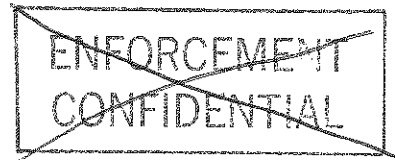
No Areas of Concern were identified during the PA/VSI

The potential for a release of hazardous constituents to the ground water, surface water, air or soil is low. A release from SWMU No. 1 would be contained within the sound secondary containment surrounding the unit. SWMU No. 2 is located in the same room as facility personnel, so any release would be immediately detected and contained.

Rogers Bros is located at 1925 Kishwaukee St. in Rockford, IL, in a residential/industrial area. The facility has a chain link fence surrounding it preventing public access.

The City of Rockford receives its water supply from a shallow sandstone aquifer located at a depth of 100 feet and extending to 300 feet. The nearest municipal well is located one mile northeast of the facility. Other than the Rock River located 0.8 mile west of Rogers Bros., there are no other wetlands or sensitive environments within two miles of the facility.





A release of 250 gallons of sulfuric acid occurred in 1977. While transferring a load of virgin sulfuric acid from a delivery truck to the product storage tank, a valve cracked, releasing the acid. The material sprayed an adjacent truck loaded with limestone. Sodium carbonate was used to neutralize the acid, which was then transferred off-site for disposal. There have been no other documented releases at the facility.

During the VSI, RAI concluded that the two waste streams generated at Rogers Bros. are properly managed and, therefore, recommends no further action at this time.



## 1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. Resource Applications, Inc. (RAI), TES 9 member, provided the necessary assistance to complete the PA/VSI activities for Rogers Brothers, Inc. (Rogers Bros.).

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.





The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Rogers Bros. facility in Rockford, Illinois. The PA was completed on June 11, 1991. RAI gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA) and from EPA Region 5 RCRA files. The VSI was conducted on July 12, 1991. It included interviews with Rogers Bros. facility representatives and a walk-through inspection of the facility. Two SWMUs and no AOCs were identified at the facility.

RAI completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and seven inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.



## **2.0 FACILITY DESCRIPTION**

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, release history, regulatory history, environmental setting, and receptors.

### **2.1 FACILITY LOCATION**

Rogers Brothers is located at 2007 Kishwaukee St., Rockford, Illinois (Figure 1). The facility is situated in a residential/industrial area at latitude 42° 07' 30" N, longitude 89° 07' 30" W. The property covers approximately 180,000 square ft. of which 60,000 square feet is occupied by buildings.

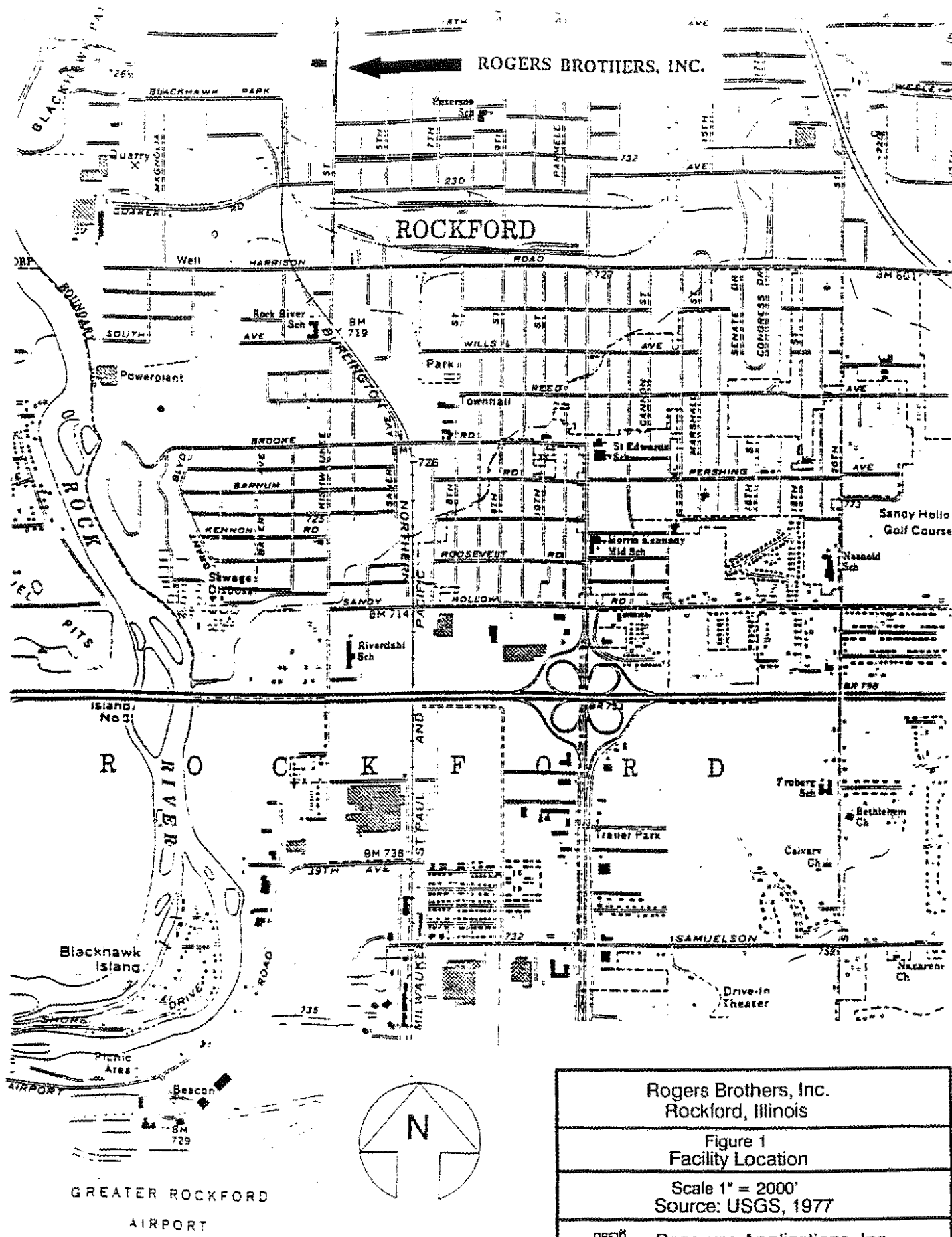
### **2.2 FACILITY OPERATIONS**

Rogers Bros. began operations at the site in 1936, before which the area was farmland. In 1975, the company changed ownership but retained its original name. Currently, Rogers Bros. employs 60 people at three shifts.

Rogers Bros. is a custom hot dip zinc galvanizer of steel parts. The material is placed in a series of caustic and acid tanks to remove any scale build up. The material is then placed in a kettle of molten zinc for galvanizing. Once galvanized, the products are cooled and packed for shipping. Residual zinc is removed from the galvanizing tank and sold on the commodities market.

Before 1980, the spent acid was neutralized and discharged in the sewer system. From 1980 to the present, the waste has been transported off-site for treatment. Since 1990, the waste oil generated at the facility has been transported off-site for treatment.






Rogers Brothers, Inc. Rockford, Illinois	
Figure 1 Facility Location	
Scale 1" = 2000' Source: USGS, 1977	
	Resource Applications, Inc.





TABLE 1  
SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Hazardous Waste Storage Area	No	Active, less than 90 days
2	Waste Oil Drum	No	Active

---

Note:

\* A RCRA hazardous waste management unit is one that currently requires a RCRA permit.

---



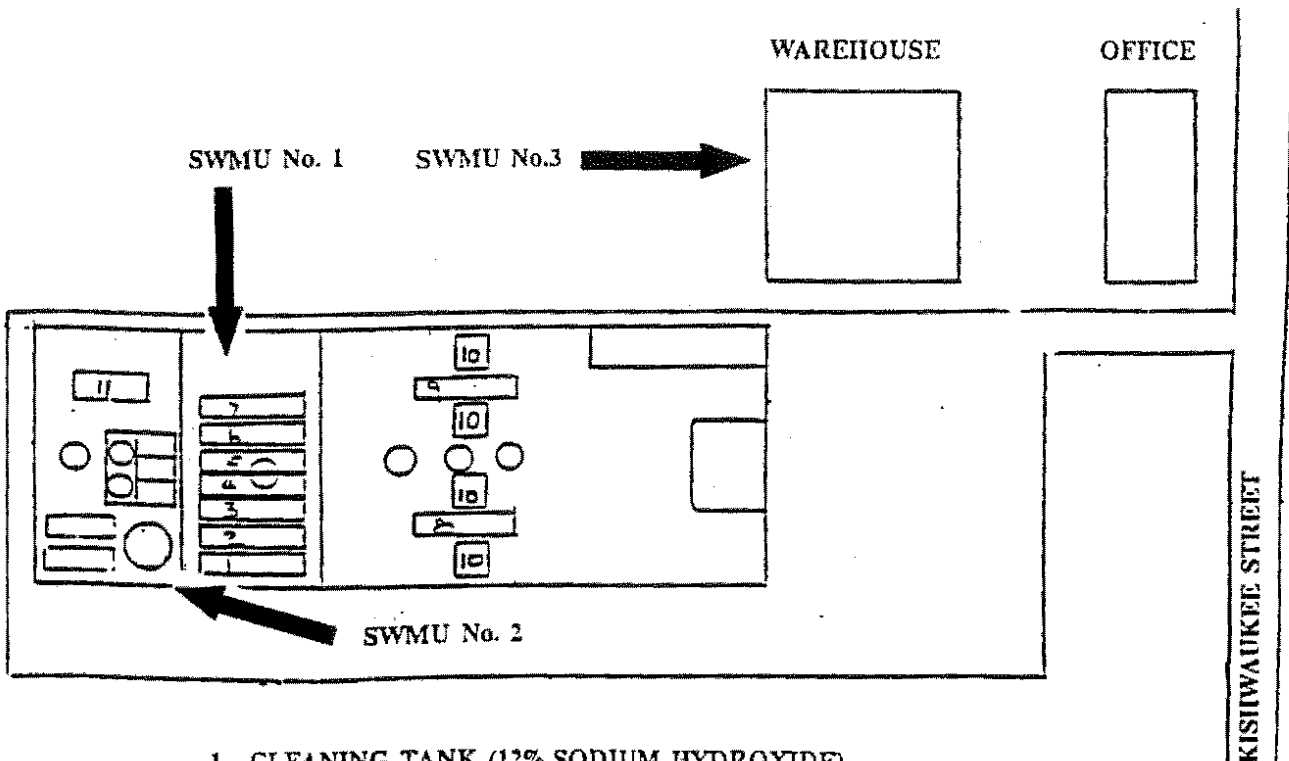
## 2.3

### WASTE GENERATING PROCESSES

Wastes are generated in two separate areas at the facility (Figure 2). The only hazardous waste, spent acid (K062), is generated in the pickling house. The spent sulfuric acid is pumped from the tank to the Hazardous Waste Storage Area. Prior to 1980, the spent pickle liquor was neutralized with caustic soda and disposed of in the sewer system. From 1980 to 1983, the waste was neutralized with anhydrous ammonia at the on-site wastewater treatment facility. After treatment, the waste was picked up for recycling by Chemical Waste Management, Inc., of Calumet City, Illinois. This treatment was discontinued after 1983 and the treatment facility was closed. Currently, the spent pickle liquor is transferred from the process tanks to the waste tanks using a portable pump. The pump is operated within the secondary containment system for the process tanks, minimizing the likelihood of a release during waste transfer. The waste is then shipped, at a rate of 9,400 gallons per month, to Envirite, Inc. of Harvey, Illinois for treatment.

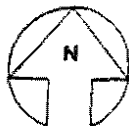
During the routine maintenance of lift trucks used at the facility, waste oil is generated. Before 1990, lift trucks used to move products around the facility, were serviced off-site. Since 1990, the waste oil generated from these trucks, at a rate of 30 gallons per month, has been collected in a 30-gallon drum and picked up by Safety-Kleen Inc., of Schaumburg, Illinois for treatment. Also since 1990, No. 105 mineral spirits has been used to clean truck parts. The cleaner is removed directly from the process by Safety-Kleen.





1. CLEANING TANK (12% SODIUM HYDROXIDE)
2. WATER RINSE TANK
3. ACID TANK (10% SULFURIC ACID)
4. ACID TANK (10% SULFURIC ACID)
5. ACID TANK (10% SULFURIC ACID)
6. WATER RINSE TANK
7. PREFLUX TANK (1% MURIATIC ACID)
8. ZINC GALVANIZING TANK
9. ZINC GALVANIZING TANK
10. WATER QUENCH TANK
11. ZINC GALVANIZING TANK

1 INCH = 100 FEET




Rogers Brothers, Inc. Rockford, Illinois	
Figure 2 Facility Layout	
1" = 100'	
Source: Rogers Brothers, 1980b	
	Resource Applications, Inc.



TABLE 2  
SOLID WASTES

<u>Waste/EPA Waste Code</u>	<u>Source</u>	<u>Primary Management Unit</u>
Spent Sulfuric Acid/K062	Pickling house	SWMU No. 1
Waste Oil	Vehicle maintenance	SWMU No. 2

---





## 2.4

### RELEASE HISTORY

On May 19, 1977, while a shipment of sulfuric acid was being unloaded to the product storage tank, a valve cracked releasing 200-250 gallons of acid. The acid sprayed a nearby truck bed loaded with limestone. The material was then neutralized with sodium carbonate and picked up by Browning Ferris Industries of Davis Junction, Illinois for disposal (IEPA, 1986b).

No other releases have been reported.

## 2.5

### REGULATORY HISTORY

Rogers Bros. filed a Notification of Hazardous Waste Activity designating the company as a generator and treatment, storage, and disposal (TSD) facility on August 15, 1980 (Rogers Bros., 1980a). The facility filed a Part A permit application to treat and store hazardous waste on November 13, 1980 (Rogers Bros., 1980b). The Part A permit was officially withdrawn on August 7, 1987 when it was determined by IEPA that the closure of the facility's waste treatment tank satisfied RCRA requirements (IEPA, 1987). Rogers Bros. is now classified as a generator only.

Rogers Bros. has an IEPA hazardous waste generator operating permit that expires on October 23, 1995 (IEPA, 1990). The facility does not discharge waste into the air or surface waters; therefore, Rogers Bros. does not have air or NPDES permits.

A February 20, 1981 IEPA inspection discovered that Rogers Bros. did not have a written schedule for inspecting facility equipment and did not maintain an inspection log. These are violations of 40 CFR 265.13 (b) (1) and 265.13 (6) (b), respectively (IEPA, 1981). Through available documentation, RAI could not determine if these issues were resolved.

A May 7, 1985 IEPA inspection revealed several violations of 35 Illinois Administrative Code. The company had failed to: 1) provide placards for transporters; 2) provide documentation that daily and weekly inspections of storage and treatment tanks are conducted; 3) keep proper personnel training records; 4) provide a communications and alarm system for facility personnel and have that alarm system easily accessible; 5) mark hazardous waste containers "Hazardous Waste"; and, 6) submit a closure plan on time (IEPA, 1985). All violations were resolved on August 20, 1985 except the closure violation (IEPA, 1986a). This was resolved when the facility officially closed the treatment tank in 1987 (IEPA 1987).



## **2.6**

## **ENVIRONMENTAL SETTING**

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the Rogers Brothers Co. facility.

### **2.6.1**

#### **Climate**

The site is situated south of Rockford, Illinois in Winnebago County. Rockford is the location of the nearest U.S. National Weather Service office. With no significant topographical barriers to the airmass flow, the climate in the area is typically continental with cold winters, warm summers and frequent short periodic fluctuations in the temperature, humidity, cloudiness and wind direction (Ruffner and Bair, 1985). The average daily temperature is 47.8°F. The lowest average daily minimum temperature is 9.8°F in January. The highest average daily maximum temperature is 91.9°F in August. The prevailing wind direction is west-southwest and the average wind speed is 9.9 miles per hour. Average annual net precipitation is 5.44 inches. In winter about one half of the precipitation, or 10 per cent of the annual total, falls as snow. During the fall, winter and spring, the pattern of precipitation tends to be more uniform over both time and distance, whereas in summer rainfall is often locally heavy and variable. The one year, 24-hour maximum rainfall recorded in the area over the last 25 years is 5.56 inches (Ruffner, 1985).

### **2.6.2**

#### **Flood Plain and Surface Water**

The general direction of surface flow is toward the Rock River which lies about 0.8 mile west of the facility and flows from north to south. The overall topography has a slope of about 40 feet over a distance of 0.8 miles, providing effective relief. The facility is in a Zone C flood plain, that is, an area of minimal flooding outside the 500-year flood plain.

### **2.6.3**

#### **Geology and Soils**

Winnebago County is characterized by broad, rolling glaciated uplands rising 200 to 300 feet above the valleys. Bedrock outcrops are numerous throughout most of the county. The landscape along the Rock River where the facility is located is characterized by glacial drift deposits that range up to 300 feet thick (Anderson, 1967). These glacial deposits, often referred to as overburden, unconsolidated material or drift, are pebbly clay, sand and gravel (Berg et al., 1984). The facility is surrounded by buildings, parking lots and pavement which prevent accurate identification of the geological features.



The area's drainage characteristics are well graded so that surface water drains to edges of lots and finally into the drainage system. As a result of construction activity the water carrying capacity and permeability of the soil varies and is generally considered low to moderate. Runoff is considered moderate to high because of the steep ground slope and the proximity of the Rock River.

In the vicinity of the facility the glacial drift is underlain by bedrock layers. The sedimentary rocks (shale, sandstone, dolomite) of the Cambrian, Ordovician and Silurian systems and Precambrian granite form the basement rocks, which are reached at a depth between 2,650 feet and 3,845 feet. Above the Precambrian granite are marine sediments, sedimentary rocks of about 2,000 feet in thickness deposited about 520 to 400 million years ago during the Cambrian, Ordovician and Silurian periods of the Paleozoic Era. They also consist of sandstones, dolomite and shales. Glacial deposits and underlying bedrock around the site provide abundant ground water, as well as mineral resources such as sand, gravel and dolomite (Berg et al., 1984).

Along the Rock River near the site, bedrock is covered by a variable thickness of unconsolidated surficial deposits including geological till and alluvium (Anderson, 1967). The uppermost constituents of the bedrock units are dolomites of the Galena and Platteville groups which are generally dependable sources of ground water. This group has a combined maximum thickness of more than 380 feet in the vicinity of the site (Berg et al., 1984).

#### **2.6.4 Ground Water**

In northern Illinois ground water resources are available from four major aquifers, including: (1) sand and gravel aquifers in the glacial drift; (2) the shallow dolomite aquifers, consisting of the Galena and Platteville dolomite groups; (3) sandstone aquifers consisting of the Glenwood-St. Peter and Ironton- Galesville sandstones; and, (4) the deeper Mt. Simon aquifers, consisting of the Mt. Simon sandstones of the Eau Claire formation (Berg et al., 1984). In the site vicinity, excellent sand and gravel aquifers occur. Municipal and industrial supplies are obtained from over 350 feet of clean course sand and gravel (Hackett and Bergstrom, 1956).

The Galena-Platteville dolomite is probably the most widely used bedrock aquifer for domestic supplies but the deeper sandstones are the most dependable source for large quantities of ground water. This group constitutes the uppermost bedrock in Winnebago County. Because of their widespread distribution, consistent water yielding zones and shallow position, these rocks provide water to most of the wells through joints and fractures close to the land surface. The average thickness of drift over the





dolomite is 30 feet and the average depth of wells is 104 feet. Reported well yields range from 5 to 40 gallons per minute (gpm) with an average yield of 20 gpm. Penetration into dolomite from about 20 to 100 feet yields satisfactory water supplies. Where the drift cover is relatively thin, dolomite aquifers are very sensitive to contamination because water moves through the joints and fractures and there is little opportunity for filtration as through granular materials (Berg et al., 1984).

The St. Peter, Ironton-Galesville and the Elmhurst-Mt. Simon sandstones furnish large quantities of water. Deeper aquifers are used only for larger municipal and industrial water supplies. The St. Peter sandstone, the shallowest aquifer in the area, is used for domestic ground water supplies and is present within a 300-foot depth of the land surface (Berg et al., 1984).

## **2.7 RECEPTORS**

Rogers Bros. is located in a residential/industrial area of in Rockford, IL. Industry borders the facility to the north and 50 feet to the east. The facility is surrounded by a chain link fence. The building that contains the hazardous material has a deadbolt lock and is also padlocked during non-business hours.

The general topography is sloped toward the Rock River, located 0.8 mile west of the facility. The facility and the community receive their water supply from ground water wells, the nearest of which is 1.25 miles northeast of the facility. Other than the Rock River, no other sensitive environments were located within two miles of the facility.

The nature of wastes generated at Rogers Bros. and the sound secondary containment within the facility keep the potential for release to the ground water, surface water, air or soil low.



### 3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the two SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of release, and RAI observations.

#### **SWMU 1**

#### **Hazardous Waste Storage Area**

**Unit Description:** Currently, this unit consists two 2,200-gallon hazardous waste storage tanks and two 4,000-gallon polypropylene sulfuric acid product tanks. Spent acids are kept in the two storage tanks for less than 90 days and shipped off site for treatment. Previously, this unit also contained a 400-gallon steel reinforced polypropylene neutralization tank. The tank was used from 1980 to 1983 and officially closed in 1987.

**Date of Startup:** 1980

**Date of Closure:** This unit is currently active.

**Wastes Managed:** Spent sulfuric acid (K062)

**Release Controls:** The unit is surrounded by a three foot high, epoxy coated, concrete berm, capable of containing a simultaneous release from all the tanks in this unit. If a release were to occur in this unit a sump pump would then pump the material into one of the two hazardous waste storage tanks.

**History of Release:** No releases have been documented.

**Observations:** The tanks and flooring appear sound and no evidence of a release was observed.



**SWMU 2**

**Oil Storage Drum**

**Unit Description:** This unit is a 30-gallon steel drum used to contain waste oil taken from the lift trucks used at the facility.

**Date of Startup:** 1990

**Date of Closure:** This unit is currently active.

**Wastes Managed:** Waste motor oil.

**Release Controls:** The waste oil is contained in a 30-gallon steel drum. The drum is located inside the facility and has sound concrete flooring beneath it. Rogers Bros. personnel are constantly in the room, so any release would be immediately detected and contained.

**History of Release:** No releases have been documented.

**Observations:** The drum appears sound and no evidence of release was observed.



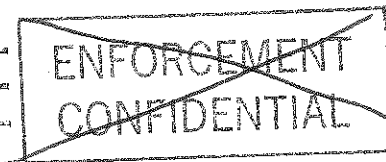
#### 4.0 AREAS OF CONCERN

RAI identified no AOCs during the PA/VSI.





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INITIALS sk



## 5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified two SWMUs and no AOCs at the Rogers Bros. facility. Background information on the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, release history, and observed condition, is discussed in Section 3.0. AOCs are discussed in Section 4.0. Following are RAI's conclusions and recommendations for each SWMU and AOC. Table 3 identifies the SWMUs and AOCs at the Rogers Bros. facility and suggested further actions.

### **SWMU 1                      Hazardous Waste Storage Area**

**Conclusions:**                      The tanks are enclosed in a three-foot high, epoxy sealed concrete berm. Due to sound secondary containment, the potential for release to ground water, surface water, air, or soil is low.

**Recommendations:**              No further action at this time.

### **SWMU 2                      Oil Storage Drum**

**Conclusions:**                      Any release of the waste oil from this unit would be detected and controlled by facility personnel located in the same room. Therefore, the potential for release to ground water, surface, water, air, or soil is low.

**Recommendations:**              No further action at this time.





TABLE 3  
SWMU AND AOC SUMMARY

<u>SWMU</u>	<u>Operational Dates</u>	<u>Evidence Of Release</u>	<u>Suggested Further Action</u>
1. Hazardous Waste Storage Area	1980 to present	None	No further action at this time.
2. Waste Oil Drum	1990 to present	None	No further action at this time.

AOC

No AOCs were identified during the PA/VSI



## REFERENCES

- Anderson, R.C., 1967. "Sand and Gravel Resources along the Rock River in Illinois", Illinois State Geological Survey Circular 414, Urbana, Illinois.
- Berg, R.C., J.P. Kempton, and A.N. Stecyk, 1984. "Geology for Planning in Boone and Winnebago Counties", Illinois State Geological Survey Circular 531, Urbana, Illinois.
- Hackett, J.E., and R.E. Bergstrom, 1956. "Groundwater in Northwestern Illinois", Illinois State Geological Survey Circular 207, Urbana, Illinois.
- Illinois Environmental Protection Agency (IEPA), 1981. Correspondence to Ray McKinnon, Rogers Bros., from Kenneth Fenner, IEPA, May 18.
- IEPA, 1985. Correspondence to Ray McKinnon, Rogers Bros., from Mark Haney, IEPA, May 21.
- IEPA, 1986a. Correspondence to Gary King, IEPA from Pat Luedtre, IEPA, March 6.
- IEPA, 1986b. Correspondence to Ray McKinnon, Rogers Bros., from Lawrence Eastep, IEPA, August 7.
- IEPA, 1987. Correspondence to Ray McKinnon, Rogers Bros., from Lawrence Eastep, IEPA, August 7.
- IEPA, 1990. Operating Permit for Rogers Bros., May 1.
- Rogers Bros., 1980a. Notification of Hazardous Waste Activity, August 15.
- Rogers Bros., 1980b. Part A Permit Application, November 13.
- Ruffner, A. and E. Bair, 1985a. Weather of U.S. Cities, Vol. 1, Gale Research Co., Detroit, Michigan.
- Ruffner, A., 1985b. Climates of the States, Vol. 1, Gale Research Co., Detroit, Michigan.
- U.S. Geological Survey, 1977. Rockford South Quadrangle, 7.5 minute topographic series.





**ATTACHMENT A**

**EPA PRELIMINARY ASSESSMENT FORM 2070-12**





POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE IL	02 SITE NUMBER ILD 005 113 063
----------------	-----------------------------------

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Rogers Brothers, Inc.		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 2007 Kishwaukee Street			
03 CITY Rockford	04 STATE IL	05 ZIP CODE 61108	06 COUNTY Winnebago	07 COUNTY CODE	08 CONG DIST
09 COORDINATES: LATITUDE <u>42 07 30.N</u>		LONGITUDE <u>089 07 30.W</u>			
10 DIRECTIONS TO SITE (Starting from nearest public road) The facility is located on the west side of Kishwaukee St., north of Blackhawk Park Avenue.					

III. RESPONSIBLE PARTIES

01 OWNER (If known) Rogers Brothers, Inc.		02 STREET (Business, mailing, residential) 2007 Kishwaukee St.			
03 CITY Rockford	04 STATE IL	05 ZIP CODE 61108	06 TELEPHONE NUMBER (815) 965-5132		
07 OPERATOR (If known and different from owner) Rogers Brothers, Inc.		08 STREET (Business, mailing, residential) 2007 Kishwaukee St.			
09 CITY Rockford	10 STATE IL	11 ZIP CODE 61108	12 TELEPHONE NUMBER (815) 965-5132		
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER _____ (Specify) <input type="checkbox"/> G. UNKNOWN					
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) <input checked="" type="checkbox"/> A. RCRA 3010 DATE RECEIVED: <u>08 / 15 / 80</u> <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ____ / ____ / ____ <input type="checkbox"/> C. NONE MONTH DAY YEAR    MONTH DAY YEAR					

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE <u>06 / 12 / 91</u> <input type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input checked="" type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): <u>Resource Applications, Inc.</u>					
02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION <table border="1"><tr><td><u>1936</u> BEGINNING YEAR</td><td><u>Present</u> ENDING YEAR</td></tr></table> <input type="checkbox"/> UNKNOWN				<u>1936</u> BEGINNING YEAR	<u>Present</u> ENDING YEAR
<u>1936</u> BEGINNING YEAR	<u>Present</u> ENDING YEAR						
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED Sulfuric acid, sodium hydroxide, and zinc.							
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION The facility is located in an industrial/residential area. Sound secondary containment would prevent a release from affecting the environment or local populations.							

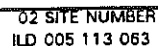
V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.) <input type="checkbox"/> A. HIGH (Inspection required promptly) <input type="checkbox"/> B. MEDIUM (Inspection required) <input type="checkbox"/> C. LOW (Inspect on time-available basis) <input checked="" type="checkbox"/> D. NONE (No further action needed; complete current disposition form)			
---	--	--	--

VI. INFORMATION AVAILABLE FROM

01 CONTACT Kevin Pierard		02 OF (Agency/Organization) U.S. EPA		03 TELEPHONE NUMBER (312) 886-4448	
04 PERSON RESPONSIBLE FOR ASSESSMENT Michael W. Gorman		05 AGENCY Resource Applications, Inc.		07 TELEPHONE NUMBER (312) 332-2230	
				08 DATE <u>07 / 06 / 91</u> MONTH DAY YEAR	





☐ A. TOXIC  
☒ B. CORROSIVE  
☐ C. RADIOACTIVE  
☐ D. PERSISTENT  
☐ E. SOLUBLE  
☐ F. INFECTIOUS  
☐ G. FLAMMABLE  
☐ H. IGNITABLE  
☐ I. HIGHLY VOLATILE  
☐ J. EXPLOSIVE  
☐ K. REACTIVE  
☐ L. INCOMPATIBLE  
☐ M. NOT APPLICABLE

## VI. SOURCES OF INFORMATION (Cite specific references; e.g., state files, sample analysis, reports)





POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND  
INCIDENTS

I. IDENTIFICATION

01 STATE IL	02 SITE NUMBER ILD 005 113 063
----------------	-----------------------------------

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 <input type="checkbox"/> A. GROUNDWATER CONTAMINATION	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
--	--	------------------------------------	----------------------------------

03 POPULATION POTENTIALLY AFFECTED: _____ N/A	04 NARRATIVE DESCRIPTION
--	--------------------------

01 <input type="checkbox"/> B. SURFACE WATER CONTAMINATION	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
--	--	------------------------------------	----------------------------------

03 POPULATION POTENTIALLY AFFECTED: _____ N/A	04 NARRATIVE DESCRIPTION
--	--------------------------

01 <input type="checkbox"/> C. CONTAMINATION OF AIR	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
---	--	------------------------------------	----------------------------------

03 POPULATION POTENTIALLY AFFECTED: _____ N/A	04 NARRATIVE DESCRIPTION
--	--------------------------

01 <input type="checkbox"/> D. FIRE/EXPLOSIVE CONDITIONS	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
--	--	------------------------------------	----------------------------------

03 POPULATION POTENTIALLY AFFECTED: _____ N/A	04 NARRATIVE DESCRIPTION
--	--------------------------

01 <input type="checkbox"/> E. DIRECT CONTACT	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
---	--	------------------------------------	----------------------------------

03 POPULATION POTENTIALLY AFFECTED: _____ N/A	04 NARRATIVE DESCRIPTION
--	--------------------------

01 <input type="checkbox"/> F. CONTAMINATION OF SOIL	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
--	--	------------------------------------	----------------------------------

03 AREA POTENTIALLY AFFECTED: _____ (Acres) N/A	04 NARRATIVE DESCRIPTION
---	--------------------------

01 <input type="checkbox"/> G. DRINKING WATER CONTAMINATION	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
---	--	------------------------------------	----------------------------------

03 POPULATION POTENTIALLY AFFECTED: _____ N/A	04 NARRATIVE DESCRIPTION
--	--------------------------

01 <input type="checkbox"/> H. WORKER EXPOSURE/INJURY	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
---	--	------------------------------------	----------------------------------

03 WORKERS POTENTIALLY AFFECTED: _____ N/A	04 NARRATIVE DESCRIPTION
---	--------------------------

01 <input type="checkbox"/> I. POPULATION EXPOSURE/INJURY	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
---	--	------------------------------------	----------------------------------

03 POPULATION POTENTIALLY AFFECTED: _____ N/A	04 NARRATIVE DESCRIPTION
--	--------------------------







POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND  
INCIDENTS

I. IDENTIFICATION

01 STATE IL	02 SITE NUMBER ILD 005 113 063
----------------	-----------------------------------

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

N/A

01 ☐ K. DAMAGE TO FAUNA 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION (Include name(s) of species)

N/A

01 ☐ L. CONTAMINATION OF FOOD CHAIN 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

N/A

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

04 NARRATIVE DESCRIPTION

N/A

01 ☐ N. DAMAGE TO OFF-SITE PROPERTY 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

N/A

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPS ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

N/A

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

N/A

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

N/A

III. TOTAL POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

IV. COMMENTS

N/A

V. SOURCES OF INFORMATION (Cite specific references; e.g., state files, sample analysis, reports)



**ATTACHMENT B**

**VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS**



## VISUAL SITE INSPECTION SUMMARY

Rogers Brothers, Inc.  
Rockford, IL  
ILD 005 113 063

Date: June 12, 1991

Facility Representatives: Raymond McKinnon, Rogers Brothers, Inc.

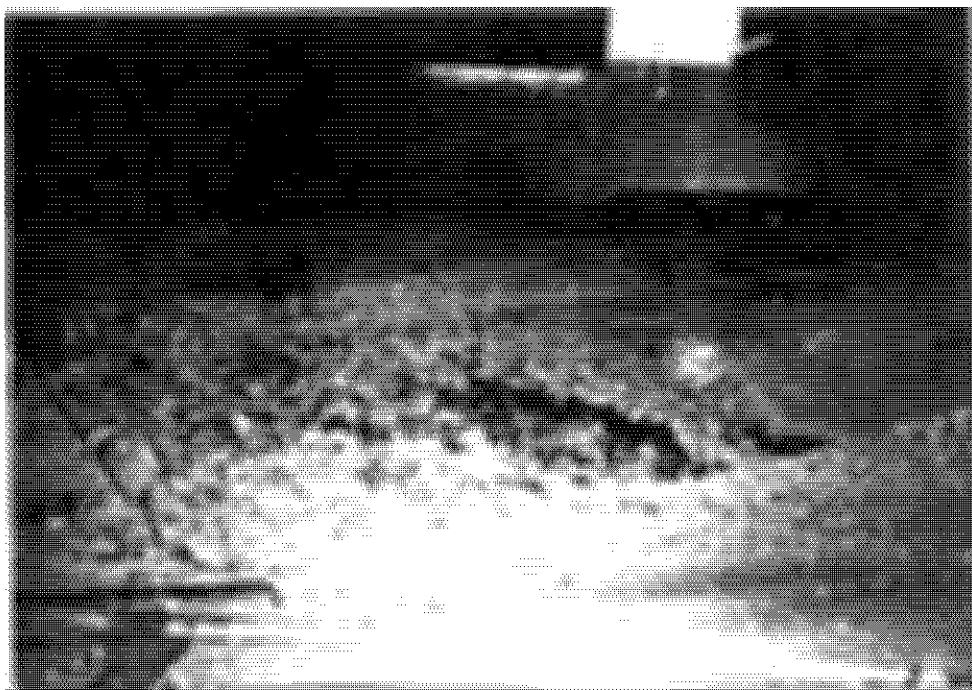
Inspection Team: Michael Gorman, Resource Applications, Inc.  
Gabrielle Norkis, Resource Applications, Inc.

Photographer: Gabrielle Norkis

Weather Conditions: Sunny, Hot, Temperature 85°F.

Summary of Activities: RAI conducted a VSI at the Rogers Bros. facility at 10:00 AM on June 12, 1991. Ray McKinnon explained the facility's operating procedures and waste management practices. The two waste streams generated at the facility (spent sulfuric acid and waste oil) are properly managed and no problems were observed. The VSI concluded at 1:00 PM.





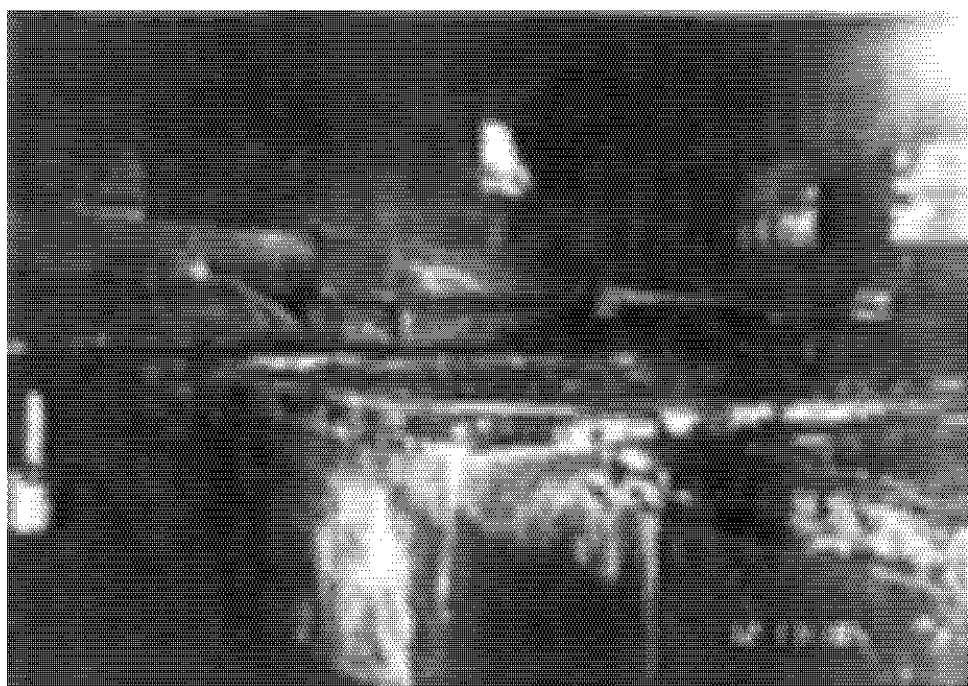
Photograph No. 1

Location: Galvanizing Tank

Orientation: Southwest

Date: 06/12/91

Description: This is a tank of molten zinc used in the galvanizing process. The tank has a pit underneath it to contain any release.



Photograph No. 2

Location: Pickling House

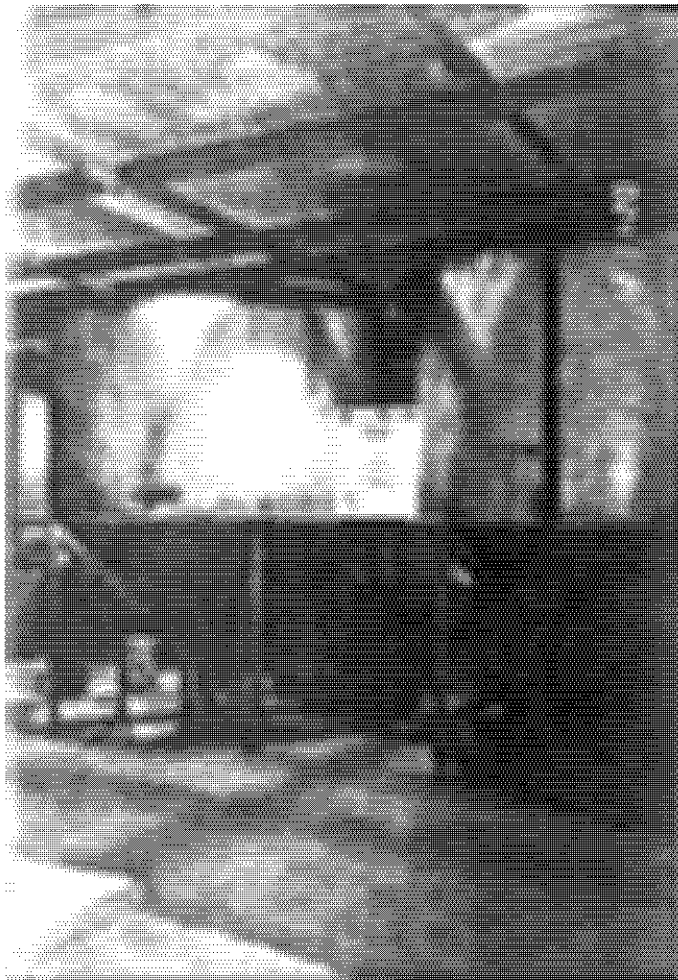
Orientation: West

Date: 06/12/91

Description: The Pickling House contains a series of caustic, acid, and water tanks used to remove scale from steel. The secondary containment underneath the tanks is lined with acid proof brick.







Photograph No. 3

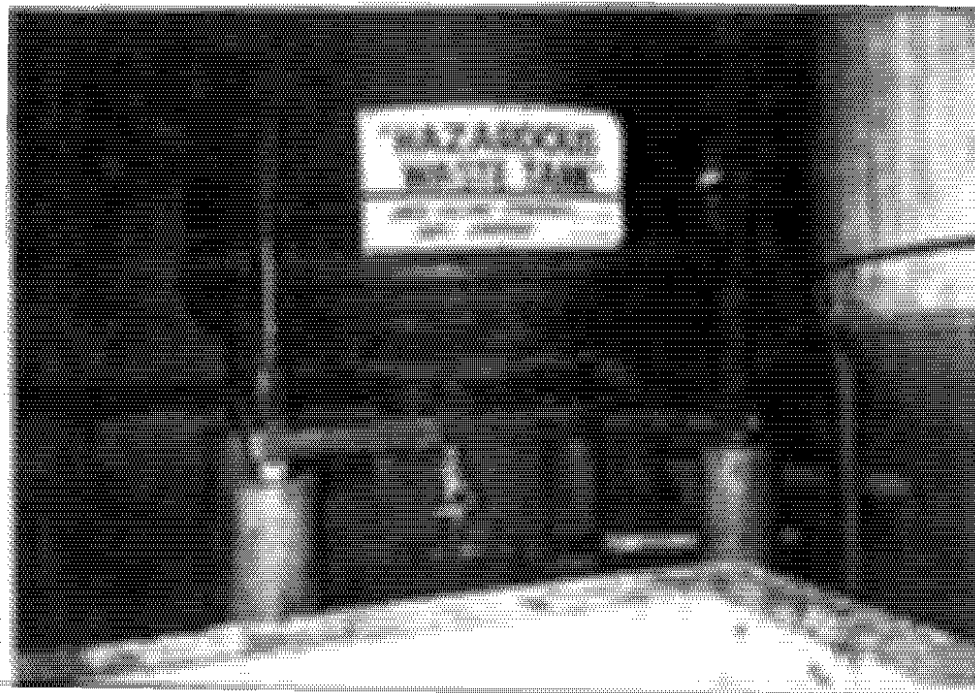
Orientation: Southwest

Description: Two 4,000-gallon sulfuric acid product tanks. The tanks are located in the Hazardous Waste Storage Area. There is a three foot high concrete berm surrounding the tanks and the floor is coated with an epoxy sealer.

Location: SWMU 2

Date: 06/12/91





Photograph No. 4

Orientation: Southwest

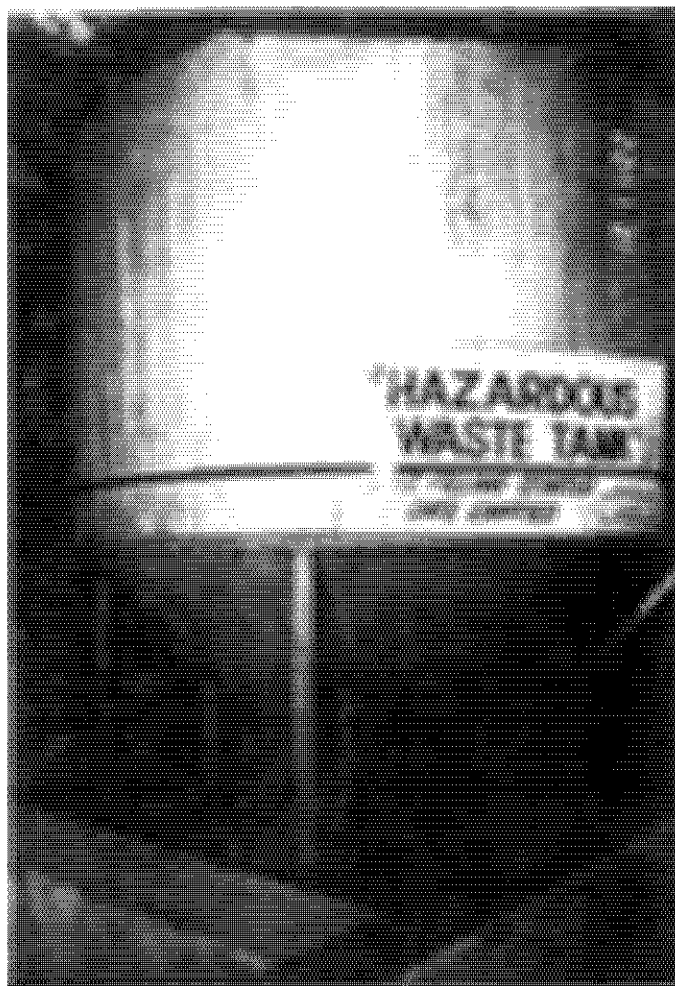
Description: One 2,200-gallon Hazardous Waste Storage Tank. This tank has the same secondary containment as the tanks in photo No.3.

Location: SWMU 2

Date: 06/12/91

This tank has the same





Photograph No. 5

Orientation: Southwest

Description: One 2,200-gallon Hazardous Waste Storage Tank. This tank is adjacent to the tank in photo No.4.

Location: SWMU 2

Date: 06/12/91





Photograph No. 6

Orientation: West

Description: The drum on the right is used to store waste oil. The oil is picked up monthly by Safety-Kleen.

Location: SWMU 3

Date: 06/12/91







Photograph No. 7

Orientation: East

Description: The wash basin and drum are used to clean truck parts. The cleaner, provided and removed by Safety-Kleen, is 105-Mineral Spirits.

Location: SWMU 3

Date: 06/12/91



**ATTACHMENT C**

**VISUAL SITE INSPECTION FIELD NOTES**



6.12.91

1

We arrived at the Rogers Bros facility at approximately 10:30 am. It was sunny and 85°. We met with Mr. Roger McKinnon.

Rogers Bros is engaged in custom hot dip galvanized steel manufacturing which is nothing like plating. Galvan. Uses sulfuric acid to clean steel.

- Custom hot dip galvanizing of steel parts which generates waste water which is categorized as spent sulfuric acid (spent pickle liquor from steel finishing operations).

G. Loh 6.12.91



Cleaning operations consist of caustic cleaner bath at 120% caustic soda in solution. Also they have 3 sulfuric acid baths which are operated at 10% in solution. Also have 1 water rinse tank; 1 pre-flux tank (bath) which is made up of 1% hydrochloric acid (rust retardant) from here (cleaning process) steel goes to galvanizing room, where everything is dipped in molten zinc at 850°F.

Spent acids are pumped into holding tanks. It stays there for 7-10 days & then it's shipped out. Tanks hold 22,000 gal. each. Enviro-rite takes the stuff out.

In the early '80s they used to neutralize it before shipping.

① Chromate - early 1980's

② Browning - Bril - mid 1980's

— G. Norbin 6.12.91 —

③ Enviro-rite ~~no~~ treating at all. Enviro-rite takes it and is.

⇒ The 6 tank areas are lined w/ acid proof brick as a 2ndary containment and set in a recess 3 feet deep.

⇒ The storage area for acids is diked & floor sealed w/ epoxy.

⇒ Used zinc is stored in drums & sold back to manufacturer for race / reuse. 3 kinds of zinc waste:

① zinc shavings / ash

② zinc bottom dross

③ black oil & ammonium chloride.

⇒ Safety Klean takes accumulated waste oil accum. from lift trucks. Stored in a drum until they take it.

— G. Norbin 6.12.91 —





They get bids for recycled/reuse  
of zinc from various manufacturers.

Raw zinc comes in 25 pound  
ignots.

product sulfuric acid comes in  
by tanker truck & is stored  
in same contained area as  
spent acid.

[Picture log]

① Raw zinc ignot = North  
this is on closed circuit T.V.

② zinc pit - west } Secondary  
③ zinc ash on pit - west } Contaminated  
④ Washed on pit - west }

⑤ zinc to be reused/purified in  
process pit - West

⑥ pickling into sulfuric, purificative, the  
18" cement on bottom; ash-pall membrane  
acid wash brick - West

North 6.12.91

⑦ Same

⑧ raw sulfuric storage  $\Rightarrow$  volume  
4,000 gal ea. polypropylene  
tanks. Contaminant 3 ft. beam.  
in goal angle, no cracks.  
South. / South-west

⑨ same

⑩ waste sulfuric storage  $\Rightarrow$  fiber  
glass tanks. South-west

⑪ same

⑫ pens under valve of storage  
tanks. No drains at all -  
South-west

⑬ there between 2 kinds of tanks.  
South-west

⑭ floor under product tanks - South  
this storage room has wooden  
walls on North-seps. it grows  
zinc too. N.

⑮ empty tank not used - west

North 6.12.91



(16) empty drums to be used for  
refill oil. - North

Industry to North  
R.R. Trax; industrial to West  
Residential to East  
Industrial to South

(17) Bottom cross storage area - North.  
This is next to each area outside.

(18) Zinc shimming ash storage  
area - North

(19) Zinc black sal storage area - East

(20) Solvent cleaner - East. Owned by  
Shamberg Safety Klem.

(21) Used & new engine oil - West

Notes 6.12.91

Treatment facility was started  
October 9, 1980 for shipment of  
Hazardous (neutralized sulfuric acid)  
shipped 11.6.80.

Bottom cross stored in dock area  
since 1975.

⇒ oil drum storage area since  
1980.

⇒ Solvent party cleaner stored in 1980.  
No UST's.

Operation is 100' x 300'.

① Repro Bros at site since 1930.

② Repro Bros owned it

③ new people (current owner)  
purchased it in 1975, kept  
name

④ ~~there~~ have 60 people at 3

shifts

Notes 6.12.91





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

RECEIVED APR 08 1993  
WMD RCRA  
RECORD CENTER *Cmp*

REPLY TO ATTENTION OF:  
5HR-12

June 4, 1991

Mr. Raymond V. McKinnon  
Vice President  
Rogers Brothers, Inc.  
2007 Kishwaukee St.  
Rockford, IL 61101

Re: Visual Site Inspection  
Rogers Brothers, Inc.  
ILD 005 113 063

Dear Mr. McKinnon:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment and Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA). The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern to make a cursory determination of their condition by visual observation. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of units at the facility and the waste management practices used.



The VSI has been scheduled for June 12, 1991. The inspection team will consist of Michael Gorman and Gabrielle Norkis of Resource Applications, Inc., contractors for the U.S. EPA.

Representatives of the Illinois Environmental Protection Agency may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI. Enclosed is a summary of our current knowledge and data gaps.

If you have any questions, please contact me at (312) 886-4448 or Sheri Bianchin at (312) 886-4446. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions portion may be made available upon request.

Sincerely yours,

*Sheri J. Bianchin*

for Kevin M. Pierard, Chief  
OH/MN Technical Enforcement Section

Enclosure

cc: Bob Wengrow, IEPA - Rockford  
Larry Eastep, IEPA - Land Pollution Control Division





ATTACHMENT

Rogers Brothers, Inc.  
2007 Kishwaukee St.  
Rockford, IL 61101

PROBABLE SOLID WASTE MANAGEMENT UNITS (SWMUS)

1. Little information was available to compile a list of solid waste management units at your facility. The only unit I know of is the one that was closed. Please list all additional waste management units currently active at your facility. If possible, please provide as complete information for the waste unit in response to the questions below.

From the list of probable SWMUS please address the following questions:

- Do the above SWMUS still exist at the facility and are they in operation?
  - What are the start-up and closure dates of the above SWMUS?
  - What types of wastes are the SWMUS currently/formerly used for?
  - Name any SWMUS at your facility that have not been listed above. These would include hazardous waste storage areas, treatment units, or any other area or system at your facility dealing with hazardous waste.
2. Please supply as much information as possible concerning the site history. This would include any information you have regarding any other owner/operators at this location.
  3. Please provide a description of the primary processes taking place at your facility and the waste streams which are generated.
  4. Describe the methods of treatment and disposal of generated waste utilized by your facility.

If available, the following items are requested:

- A detailed map of the facility showing the location of the SWMUS and production stations.
- Flow diagrams showing waste streams and waste management practices.



N N

CERTIFICATION REGARDING POTENTIAL RELEASES FROM  
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: Rogers Brothers Co., Inc.  
EPA I.D. NUMBER: ILD005113063  
LOCATION CITY: 2007 Kishwaukee Street  
STATE: Rockford, IL 61108

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	<u>YES</u>	<u>NO</u>
• Landfill	<u>      </u>	<u>X</u>
• Surface Impoundment	<u>      </u>	<u>X</u>
• Land Farm	<u>      </u>	<u>X</u>
• Waste Pile	<u>      </u>	<u>X</u>
• Incinerator	<u>      </u>	<u>X</u>
• Storage Tank (Above Ground)	<u>      </u>	<u>X</u>
• Storage Tank (Underground)	<u>      </u>	<u>X</u>
• Container Storage Area	<u>      </u>	<u>X</u>
• Injection Wells	<u>      </u>	<u>X</u>
• Wastewater Treatment Units	<u>      </u>	<u>X</u>
• Transfer Stations	<u>      </u>	<u>X</u>
• Waste Recycling Operations	<u>      </u>	<u>X</u>
• Waste Treatment, Detoxification	<u>      </u>	<u>X</u>
• Other <u>                    </u>	<u>      </u>	<u>      </u>

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

N/A

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.



3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

a. May 19, 1977	b. Spent sulfuric acid pickle liquor
c. 200 - 250 gallons	d. Cracked valve

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

There was no environmental contamination from this release. A truck load of limestone was stored on a concrete pad, when the valve cracked it sprayed the limestone with pickle liquor. The load of limestone and pickle liquor was neutralized with sodium carbonate. Covered

for protection until we received approval for disposal. Copy attached. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

Raymond V. McKinnon

Typed Name and Title

*Raymond V. McKinnon*  
Signature

*3-10-86*  
Date



**CONTINUING RELEASES AT PERMITTED FACILITIES**

**Sec. 206.** Section 3004 of the Solid Waste Disposal Act is amended by adding the following new subsection after subsection (t) thereof:

· **"(u) CONTINUING RELEASES AT PERMITTED FACILITIES.**—Standards promulgated under this section shall require, and a permit issued after the date of enactment of the Hazardous and Solid Waste Amendments of 1984 by the Administrator or a State shall require, corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage, or disposal facility seeking a permit under this subtitle, regardless of the time at which waste was placed in such unit. Permits issued under section 3005 shall contain schedules of compliance for such corrective action (where such corrective action cannot be completed prior to issuance of the permit) and assurances of financial responsibility for completing such corrective action."







Illinois Environmental Protection Agency  
Division of Land Pollution Control  
Permit Section  
2200 Churchill Road  
Springfield, Illinois 62706

Received 6-13-77  
Issued 6-16-77  
Expires 6-16-78  
Permit No. 77-656  
Approved WWR

Application for a Supplemental Permit for the Disposal of Special and/or Hazardous Wastes  
at an IEPA Permitted Solid Waste Management Site

I. GENERAL INFORMATION

- A. Name of Applicant BROWNING-FERRIS INDUSTRIES OF ROCKFORD, INC.  
Address P. O. BOX 35 - ROCKFORD, ILLINOIS 61108  
Telephone (815) 397-5766
- B. Name of SWM Site OGLE COUNTY - DAVIS JUNCTION/OGLE COUNTY LANDFILL  
(County) (City or Township) (Site)  
I.E.P.A. Operation Permit No. 1975-11-OP  
Site Inventory No. 14182101
- C. Name of Special Waste Hauler BROWNING-FERRIS INDUSTRIES OF ROCKFORD, I  
Address P. O. BOX 35 - ROCKFORD, ILLINOIS 61108  
Telephone (815) 397-5766
- D. Name of Special Waste Generator \*ROGERS BROTHERS COMPANY  
Address 2007 KISHWAUKEE - ROCKFORD, ILLINOIS  
Telephone (815) 965-5132  
\*Optional. A record of the Waste Generators shall be maintained by the haulers  
and available to this Agency upon request.

II. CHARACTERISTICS OF WASTE

- A. Quantity 20 CU. YD. per N/A  
(cubic yards or gallons) (day, week, month)  
for ONE TIME DISPOSAL  
(one time, week, month, etc.)

**RECEIVED**

JUN 15 1977

B. Quality

1. Name of Waste SULFURIC ACID (NEUTRALIZED) D.I.P.C.  
ST. LOUIS, MO
2. Name the process and/or type of industry producing the waste GALVANIZING  
Indicate SIC Classification 3479
3. An analysis of the chemical and physical characteristics of the waste  
must be determined by a qualified lab and be attached to this application.  
Does the special waste contain any hazardous chemicals? CONTAINS HEAVY  
METALS - SEE ANALYSIS ATTACH
4. All hazards (health, safety, and/or fire) and/or nuisance problems  
associated with the waste must be designated and necessary safety and  
handling precautions delineated. Specify available communications and  
assistance in case of emergency or fire. MATERIAL HAS BEEN NEUTRALIZED  
WITH SODIUM CARBONATE AND IS IN A SOLID STATE. MATERIAL MUST  
BE ISOLATED FROM GROUND AND/OR SURFACE WATER TO PREVENT WATER  
POLLUTION FROM HEAVY METALS. PRESENT IN WASTE.



FOR AGENCY AND APPLICANT INFORMATION

III. DISPOSAL METHOD

- A. Quantity of dry refuse (uncompacted) deposited at the solid waste disposal site during the last full month. Verification may be required.

Quantity 25,000 CU. YD.  
(cubic yards)

MONTH  
(month/year)

B. Disposal Method

1. Describe the proposed onsite waste handling and disposal procedures, including methods and/or devices for incorporation of the waste into the landfill.

WASTE IS TO BE RECEIVED AT END OF WORKING DAY AND BE MIXED WITH DRY REFUSE IN ACTIVE FILL FACE. PROVIDE IMMEDIATE 6" DAILY COVER.

2. Indicate what alternates, beside land disposal, exist for the treatment and/or disposal of the subject waste.

NO ALTERNATIVE LOCAL DISPOSAL METHODS AVAILABLE.

3. Describe available waste storage facilities.

SHORT TERM STORAGE ONLY AVAILABLE AT GENERATOR'S FACILITIES. NO STORAGE AVAILABLE AT LANDFILL SITE.

4. Describe wet weather disposal procedures.

TO AVOID POTENTIAL SURFACE WATER POLLUTION, WASTE IS TO BE HANDLED ONLY DURING A DRY WEATHER PERIOD.

5. Describe the location of the disposal area. Indicate the trench(es) and/or areas where the waste will be deposited. If the location cannot be clearly identified, a 8½"x11" map of the area should be provided.

DISPOSAL AREA IS TO BE IN THE ACTIVE GENERAL REFUSE FILL.

IV. SIGNATURE OF APPLICANT

I hereby request to accept the subject wastes, and by my signature, I affirm that the information in this application is to the best of my knowledge and belief, true, complete and accurate, and I agree to comply with the requirements specified in this application. BROWNING-FERRIS INDUSTRIES OF ROCKFORD, INC.

Signature of Applicant *James Douglas Andrews* Date JUNE 14, 1977

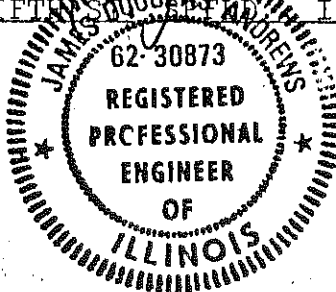
Attest: \_\_\_\_\_ Date JUNE 14, 1977

SIGNATURE OF ENGINEER

I hereby certify that the subject waste and the proposed disposal procedures are compatible with the geological setting and engineered features of the site.

Signature of Engineer *James Douglas Andrews* No. 62-30873

Address 1320 SOUTH FIFTH AVE, ROCKFORD, ILL. Telephone (217) 528-1545





# AQUALAB

DATE: June 3, 1977

ANALYSIS NO: 2-1117

Browning-Ferris Industries of Rockford  
Post Office Box 35  
Rockford, Illinois 61108

Attn: C.M. (Skete) Atkinson

TAKEN: 5/20/77

RECEIVED: 5/20/77/1010

ANALYZED: 5/20/77/1300

SAMPLE DESCRIPTION: From Rogers Bros. Company

Cadmium 3.05ppm

Lead 123.5ppm

pH 6.99

Solids, total 71.82%

Zinc 33.5ppm

Flash Point: never flashed, never boiled  
up to 210°F

T.A. Reid

T.A. REID  
LABORATORY DIRECTOR



BROWNING-FERRIS INDUSTRIES of  
ROCKFORD, INC.  
P. O. Box 35  
Rockford, Illinois 61105

WASTE "TYPE" CHEMICAL CHARACTERISTIC - DISPOSAL APPLICATION

Provide a complete laboratory analysis of Group A B C as follows: (Standard Methods current edition or USEPA Methods for Chemical Analysis of Water and Wastes - 1974). A SIGNED AND DATED REPORT FROM THE LAB MUST BE INCLUDED.

GROUP A

pH  
Flash Point  
Total Solids  
Heavy Metal Scan  
Acidity (if pH below 3)  
Alkalinity (if pH above 10)

GROUP B

Group A  
Arsenic  
Cadmium  
Chromium, tot  
Nickel  
Lead  
Zinc  
Mercury  
Cyanide  
Phenol

GROUP C

Group A  
Group B  
Gross alpha  
Organohalides

RELEASED  
DATE 08-14-17  
RIN # 2017-009119  
INITIALS *WLP*

"CONFIDENTIAL" HAULER-GENERATOR DISPOSAL INFORMATION  
(Ink Print or Type)

Application Date May 20, 1977  
Name of Hauler Browning-Ferris Ind.  
Signature B. L. Larson  
Address 4210 - 11<sup>th</sup> St. - Rockford, Ill.  
Phone 1-815-397-5766

Office Use Only

Waste ID# \_\_\_\_\_  
Date \_\_\_\_\_  
Type: I ☐ II ☐ III ☐ IV ☐  
Disposal Site: \_\_\_\_\_

- Name of Generator (or Code Name) ROBERS BROS CO Phone 965-5132  
Address 2007 KISHWAUTEE ROCKFORD ILL 61101
- Type of Industry GALVANIZING S.I.C.\* \_\_\_\_\_  
Name of processes or procedures specific to the waste production: \_\_\_\_\_  
(Leave blank if unknown)  
\*Standard Industrial Classification
- Quantity of Waste Generated 20 per ONETIME ONLY  
(cubic yds or gal.) (day, week, month)
- Cartage Container(s): Dump Truck, Bulk Tanker, Roll-Off Box, Drums (circle)
- Known contact and/or toxicological health hazards associated with waste \_\_\_\_\_
- Chemical Name or Trade Name of Majority (50% Concentration) Constituent(s)  
SULFURIC ACID WITH SODA ASH IN GRAVEL MIX





# LAND AND CHEMICALS DIVISION

Type of Document: RTC Letter

Name of Document: Rogers Brothers Galvanizing

	<u>NAMES</u>	<u>DATE</u>
AUTHOR:	<u>TODD BROWN TB</u>	<u>7/28/14</u>
APA:	<u>Ruben Aridge RA</u>	<u>7/28/2014</u>
SECTION CHIEF:	<u>Mike Cunningham <sup>in</sup> MC</u>	<u>7/28/2014</u>
BRANCH CHIEF:	<u>Gary Victorine <sup>GP</sup></u>	<u>8/1/2014</u>
Executive Assistant:	_____	_____
DIVISION DIRECTOR:	_____	_____
OTHERS:	_____	_____
	_____	_____
DRA:	_____	_____
RA:	_____	_____

RETURN TO: \_\_\_\_\_

PHONE: \_\_\_\_\_

COMMENTS:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

AUG 01 2014

REPLY TO THE ATTENTION OF:

Mr. Michael R. McKinnon  
President  
Rogers Brothers Galvanizing  
1925 Kishwaukee Street  
Rockford, Illinois 61104

Re: Rogers Brothers Galvanizing  
EPA ID No.: ILD005113063

Dear Mr. McKinnon:

On May 29, 2013 a representative of the U.S. Environmental Protection Agency inspected Rogers Brothers Galvanizing located in Rockford, Illinois. In response to violations of the Resource Conservation and Recovery Act identified during the inspection, we issued a Notice of Violation to you on March 5, 2014. Subsequent to our Notice of Violation you submitted additional information regarding the identified violations in correspondence dated April 9 and May 2, 2014.

This letter is to inform you that EPA has reviewed the referenced responses, and does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA and the Illinois Environmental Protection Agency (IEPA) will continue to evaluate your facility in the future.

If you have any questions or concerns regarding this matter, please contact Todd Brown, of my staff, at (312) 886-6091.

Sincerely,

A handwritten signature in blue ink, reading "Gary J. Victorine", is written over the typed name and title.

Gary J. Victorine, Chief  
RCRA Branch

cc: Todd Marvel (IEPA), [todd.marvel@illinois.gov](mailto:todd.marvel@illinois.gov)

